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Unsecured Creditors

13 **UNITED STATES BANKRUPTCY COURT**  
14 **NORTHERN DISTRICT OF CALIFORNIA**  
15 **SAN FRANCISCO DIVISION**

16 In re  
17 THE ROMAN CATHOLIC ARCHBISHOP  
18 OF SAN FRANCISCO,  
19 Debtor.

Case No. 23-30564

Chapter 11

**DECLARATION OF VINCE FINALDI IN  
SUPPORT OF THE OFFICIAL  
COMMITTEE OF UNSECURED  
CREDITORS' MOTION FOR AN ORDER  
GRANTING CERTAIN TRIAL-READY  
SURVIVORS RELIEF FROM THE  
AUTOMATIC STAY TO PURSUE STATE  
COURT LITIGATION**

23  
24 I, Vince Finaldi, declare under penalty of perjury as follows:

25 1. I am a partner of the law firm of Manly Stewart Finaldi, counsel to John SF-1 Doe  
26 (“Survivor Plaintiff”) and numerous other childhood sexual abuse survivors who have filed  
27 lawsuits against The Roman Catholic Archbishop of San Francisco (the “Archdiocese”). I am  
28 duly admitted to practice law in the state and federal courts of California. I submit this

1 Declaration in support of *The Official Committee of Unsecured Creditors' Motion for an Order*  
2 *Granting Certain Trial-Ready Survivors Relief From the Automatic Stay to Pursue State Court*  
3 *Litigation* (the "Motion for Stay Relief"),<sup>1</sup> filed herewith. I have personal knowledge of the facts  
4 set forth herein unless otherwise stated.

5         2. I am an attorney of record for the Survivor Plaintiff in the Trial Case that is  
6 pending and stayed in San Francisco County Superior Court, *John SF-1 Doe v. Doe 1 et al.*, case  
7 number CGC-20-584162, and lead plaintiffs' counsel for the Trial Cases. The Trial Cases were  
8 subject to coordination in the Coordinated Proceeding pending in Alameda County Superior  
9 Court, *In re Northern California Clergy Cases*, JCCP No. 5108.

10         3. My client initiated his Trial Case on April 16, 2020 by filing a complaint for  
11 damages. My client alleges that he was repeatedly sexually abused by Father Joseph Pritchard,  
12 beginning in or around 1974, when he was 11 years old and in the fifth grade, until he was 14  
13 years old in or about 1977. My client and I were prepared to bring the Trial Case before a San  
14 Francisco jury in August 2023, after extensive discovery was completed, pretrial motions were  
15 filed, and motions in limine were submitted. The Trial Case was automatically stayed and my  
16 client was denied an opportunity to prove his claims just two days before the trial was scheduled  
17 to begin. On behalf of my client, **I am ready to request a renewed trial date from the San**  
18 **Francisco Superior Court as soon as possible.**

19         **The Coordinated Proceeding**

20         4. The Trial Case has been subject to coordination in the Coordinated Proceeding. All  
21 lawsuits alleging sexual abuse against various Catholic institutions in Northern California are  
22 before a single judge and the individual actions have been stayed. The initial coordinating judge  
23 established a protocol for preliminary discovery, including the exchange of detailed "fact sheets"  
24 and document productions by the plaintiffs and defendants. Thereafter, cases from the  
25 Coordinated Proceeding were selected for bellwether trials, with the litigation stay lifted for  
26

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27 <sup>1</sup> Capitalized terms have the meanings set forth in the Motion for Stay Relief unless otherwise  
28 defined.

1 purposes of depositions, expert discovery, and dispositive motions, in preparation for sending the  
2 bellwether cases back to their original courts for jury trial.

3 5. Attached hereto as **Exhibit F** is a copy of the *Order Granting Petition to*  
4 *Coordinate* entered on July 22, 2020 in the Coordinated Proceeding.

5 6. Attached hereto as **Exhibit G** is a copy of the *Stipulation and Order Re:*  
6 *Preliminary Discovery Procedures (Fact Sheets, Authorizations, and Production of Documents)*  
7 entered on August 10, 2021 in the Coordinated Proceeding.

8 7. Attached hereto as **Exhibit H** is a copy of the *Order on Criteria for Bellwether*  
9 *Cases* entered on November 18, 2022 in the Coordinated Proceeding.

10 8. Attached hereto as **Exhibit I** is a copy of the *Order Lifting Stay of Discovery as to*  
11 *Certain Bellwether Trial Cases* entered on November 30, 2022 in the Coordinated Proceeding.  
12 Pursuant to this order, the Trial Case was identified as a representative case that would proceed to  
13 trial and the coordinating stay was lifted to permit further discovery.

14 9. Attached hereto as **Exhibit J** is a copy of the *Amended Case Management*  
15 *Conference Order* entered on December 5, 2022 in the Coordinated Proceeding.

16 10. Attached hereto as **Exhibit K** is a copy of the *Order Transferring Case to San*  
17 *Francisco for Trial* entered on December 12, 2022 in the Coordinated Proceeding. This order  
18 specified that transfer of the Trial Case was effective June 15, 2023, at which point the cases were  
19 required to be “trial ready.”

20 11. Attached hereto as **Exhibit L** is a copy of *Order Regarding Pretrial Dates and*  
21 *Deadlines for San Francisco County Bellwether Trial(s)* entered on March 23, 2023 in the  
22 Coordinated Proceeding. Pursuant to this order, the coordinating judge established pretrial  
23 deadlines for discovery and motions in the Trial Cases prior to their transfer to San Francisco  
24 Superior Court.

25 12. Attached hereto as **Exhibit M** is a copy of the *Order Transferring John SF-I v.*  
26 *RCASF, San Francisco CGC-20-584162 to San Francisco for Trial* entered on July 19, 2023 in  
27 the Coordinated Proceeding.  
28

1           13.     On or about December 29, 2023, the Coordinated Proceeding was reassigned from  
2 Judge Evelio Grillo to Judge Noel Wise.

3           14.     On or about December 24, 2024, the Coordinated Proceeding was reassigned to  
4 Judge S. Raj Chatterjee.

5           15.     Attached hereto as **Exhibit N** is a copy of the Case Management Order entered on  
6 January 23, 2025 by Judge Chatterjee.

7           **The San Francisco Trial Preparation**

8           16.     Attached hereto as **Exhibit O** is a copy of the *Minutes of the Case Management*  
9 *Conference* dated August 11, 2023. Pursuant to the case management conference, the Trial Cases  
10 were set for a trial to begin on August 23, 2023 at 9:30 a.m. before Judge Garrett Wong in  
11 Department 604, with all motions including motions in limine due on August 17, 2023 and  
12 oppositions due on August 21, 2023. At that point, the Trial Cases were jointly administered but  
13 had not been consolidated.

14          17.     On August 16 and 17, 2023, the Archdiocese filed the following pleadings in the  
15 Trial Cases:

- 16           • Memorandum of Points and Authorities in Opposition to Plaintiff's Joint Motion to  
17 Consolidate Cases for Trial;
  - 18           ○ Declaration of Steven Penrod in Opposition to Plaintiff's Joint Motion to
  - 19 Consolidate Cases for Trial
  - 20           ○ Declaration of Zachary Smith in Opposition to Plaintiffs' Joint Motion to
  - 21 Consolidate Cases for Trial
  - 22           ○ Request for Judicial Notice and Declaration of Zachary Smith in Opposition
  - 23 to Plaintiffs' Joint Motion to Consolidate Cases for Trial
- 24           • Notice of Motion and Motion to Bifurcate Trial Pursuant to Civil Code 3295;  
25 Memorandum of Points and Authorities in Support of Motion to Bifurcate Trial  
26 Pursuant to Civil Code 3295
  - 27           ○ Declaration of Zachary Smith in Support of Defendant's Motion to
  - 28 Bifurcate Trial



- Request for Judicial Notice and Declaration of Zachary Smith in Support of Defendant's Motion to Bifurcate Trial
  - Notice of Motion and Motion to Strike Irrelevant and Improper Matter from Plaintiffs' Pleading
  - Motion in Limine No. 1 to Prohibit Mention of Defendant's Wealth or Profits
  - Motion in Limine No. 2 to Prohibit Mention of Other Cases or Claims
  - Motion in Limine No. 3 to Prohibit Evidence, Argument, and/or Mention of Pritchard as a Party to the Action
  - Motion in Limine No. 4 to Prohibit Evidence, Argument, and/or Mention of the 2004 Recreated Letter
  - Motion in Limine No. 5 to Preclude Expert Opinions on Plaintiffs' Lost Earnings
    - Declaration of Zachary Smith in Support of Defendant's Motions in Limine
    - Request for Judicial Notice and Declaration of Zachary Smith in Support of Defendant's Motions in Limine
18. On August 17, 2023, the Survivor Plaintiffs jointly filed the following pleadings:
- Joint Notice of Motion to Consolidate Cases for Joint Trial Pursuant to CCP 1048(a)
    - Memorandum of Points and Authorities in Support of Plaintiffs' Joint Motion to Consolidate Cases for Joint Trial
    - Declaration of Richard Simons in Support of Plaintiffs' Joint Motion to Consolidate Cases for Joint Trial
  - Joint Motion in Limine No. 1 to Exclude Evidence of, Referral to, and Instructions or Argument of Allocation of Fault to Fr. Pritchard or Any Other Person or Entity
    - Declaration of Alex Cunny, Esq. in Support of Plaintiff John SF-1 Doe's Joint Motion in Limine No. 1
    - Declaration of Richard Simons in Support of Plaintiff John Doe SF 1013's Joint Motion in Limine No. 1

- Joint Motion in Limine No. 2 to Exclude Evidence in Support of Defendant Archbishop's Denial of Notice or Affirmative Defenses of Such Denial
  - Declaration of Richard Simons in Support of Plaintiff John Doe SF 1013's Joint Motion in Limine No. 2
  - Declaration of Alex Cunny in Support of Plaintiff John SF-1 Doe's Joint Motion in Limine No. 2
  - Request for Judicial Notice in Support of Joint Motion in Limine No. 2
- Plaintiff's John SF-1 Doe's Joint Motion in Limine No. 3 to Exclude Evidence of, Referral to, or Questioning About the Molestation or Abuse of Non-Party Family Members of Plaintiff by Individuals Other Than Fr. Pritchard
  - Declaration of Alex Cunny, Esq. in Support of Plaintiff John SF-1 Doe's Joint Motion in Limine No. 3

19. Attached hereto as **Exhibit P** is a copy of the San Francisco Superior Court's register of actions for the Trial Case, case number CGC20-584162.

20. The parties did not file oppositions to the motions describe above, which were due on August 21, 2023, because the Archdiocese filed for bankruptcy on that date. The Trial Cases were automatically stayed and my client was prevented from litigating his case. On behalf of my client, I request the Bankruptcy Court lift the automatic stay to allow us to bring the Trial Cases to judgment before a jury, with the understanding that a judgment will not be enforceable against the Debtor absent further order of the Court.

Pursuant to 28 U.S.C. sec. 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief. Executed on February 20, 2025 in Irvine, California.

By:

  
Vince W. Finaldi

# EXHIBIT F

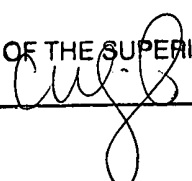


20907601

**FILED**  
ALAMEDA COUNTY

JUL 22 2020

CLERK OF THE SUPERIOR COURT

By  Deputy

## SUPERIOR COURT OF THE STATE OF CALIFORNIA

## IN AND FOR THE COUNTY OF ALAMEDA

IN RE NORTHERN CALIFORNIA CLERGY  
CASES

No. JCCP 5108

ORDER GRANTING PETITION TO  
COORDINATEDATE 7/22/20  
TIME 9:00  
DEPT 21

The cases in the petition for coordination generally (1) allege childhood sexual assault as defined in CCP 340.1(d) and (2) were filed under the reprieve from the statute of limitations in CCP 340.1(q) as recently amended by AB 218. A group of plaintiffs opposes parts of the petition. No defendant has opposed the petition.

This court has been appointed coordination motion judge in JCCP 5108, but the court is aware of related cases in JCCP 5114 (which does not have an assigned coordination motion judge) and related cases filed in Alameda County. In the interest of case coordination generally, the court address all three categories of cases.

1 IN RE NORTHERN CALIFORNIA CLERGY CASES, JCCP 5108

2 On 5/8/20, plaintiff in John SF-1 Doe v. Doe 1, Superior Court of the State of California,  
3 San Francisco, Case no. CGC-20-584-162 filed a petition to coordinate.

4 On 6/15/20, the Chair of the Judicial Council issued an Order Assigning Coordination  
5 Motion Judge, authorizing the presiding Judge in Alameda County to appoint a Coordination  
6 Motion Judge. (CCP 404; CRC 3.524.)

7 On 7/1/20, Judge Brad Seligman as Supervising Judge of Complex assigned Winifred  
8 Smith to sit as coordination motion judge to determine whether coordination of the included  
9 actions is appropriate. (C.C.P. § 404; C.R.C. 3.524.)

10 On 7/22/20, Judge Smith as coordination motion judge considered whether to coordinate  
11 the included actions. The included actions are defined as the actions identified in the petition  
12 dated 5/8/20 and the Judicial Council's order dated 6/15/20.

13 The identified superior court case numbers in the Petition for Coordination filed 5/8/20 in  
14 *John SF-1 Doe v. Doe 1*, San Francisco Case No. CGC-20-584-162, and in the Judicial Council  
15 Order dated 6/15/20 are:

16 John SF-1 Doe v. Doe 1, San Francisco Case No. CGC-20-584-162

17 John OAK-4 Doe v. Roman Catholic Bishop of Oakland, Alameda Case No. RG20-  
18 056654

19 John M-1 Doe v. Doe 1, San Francisco Case No. CGC-20-583959

20 John SF-2 Doe v. Doe 1, San Francisco Case No. CGC-20-584124

21 John SF-1 Doe v. Doe 1, San Francisco Case No. CGC-20-584163

22 John SR-1 Doe v. Doe 1, Sonoma Case No. SCV-266141

1 BAY AREA CLERGY CASES, JCCP 5114

2 Separate and independent of the petition for coordination in JCCP 5108, plaintiffs filed a  
3 similar and overlapping petition for coordination. The Judicial Council has identified this  
4 petition for coordination as Bay Area Clergy Cases, JCCP 5114. The Judicial Council has not  
5 assigned JCCP 5114 to any county for appointment of a coordination motion judge.  
6 ([https://www.courts.ca.gov/documents/CivilCaseCoord\\_2012toPresent\\_JCCPLog.pdf](https://www.courts.ca.gov/documents/CivilCaseCoord_2012toPresent_JCCPLog.pdf))

7  
8 The identified superior court case numbers in the Petition for Coordination filed 6/15/20  
9 in *Brogan v. Doe 1*, Alameda Case No. HG19-048691, are:

10 ALAMEDA CASES

11 McLennan v. Doe, Alameda Case No. RG20-061260

12 Doe OK 1009 v. Doe, Alameda Case No. HG20-053984

13 Barnes v. Doe, Alameda Case No. HG20-053983

14 Brogan v. Doe 1, Alameda Case No. HG19-048691

15 Doe OK 1017 v. Doe, Alameda Case No. RG20-057493

16 Doe OK 1008 v. Doe, Alameda Case No. HG20-053924

17 Doe OK 1011 v. Doe, Alameda Case No. RG20-057425

18 Doe OK 1031 v. Doe, Alameda Case No. HG20-053951

19 Doe OK 1014 v. Doe, Alameda Case No. HG20-053992

20 Stonebraker v. Doe, Alameda Case No. HG20-053989

21 Doe OK 1022 v. Doe, Alameda Case No. HG19-048685

22 Ash, McCann, and Stone v. Doe, Alameda Case No. RG19-039073

23 Duenas v. Doe, Alameda Case No. RG19-041044

24 Houle v. Doe, Alameda Case No. HG19-042086

25 Lopez v. Doe, Alameda Case No. RG20-048852

1 J.S. v. Doe, Alameda Case No. RG20-061096

2  
3 SAN FRANCISCO CASES

4 Doe SF 1013 v. Doe, San Francisco No. CGC-20-583648

5 Doe SF 1010 v. Doe, San Francisco No. CGC-20-583643

6 Goldberg v. Doe, San Francisco No. CGC-19-581942

7  
8 SONOMA CASES

9 Doe SR 1020 v. Doe, Sonoma No. SCV-265775

10 Doe SR 1021 v. Doe, Sonoma No. SCV-265774

11 Doe SR 1015 v. Doe, Sonoma No. SCV-266360

12 Holden, Doe 159, and Doe 164 v. Doe, Sonoma No. SCV-265359

13 Sloan, Doe 129, and Doe 130 v. Doe, Sonoma No. SCV-2665758 [typo?]

14 Doe 11 v. Doe, Sonoma No. SCV-265757

15 Zink and Doe 58 v. Roman Catholic Bishop of Santa Rosa, Sonoma No. SCV-265991

16  
17 OTHER CASES

18 Doe MR 1006 v. Doe, Monterey No. 19CV—005258

19 Doe 74 and Doe 75 v. Doe, Monterey No. 19CV—004154

20 Hoey v. Doe, Contra Costa No. MSC19-02227

21 Doe 103 v. Doe, Santa Clara No. \_\_\_\_\_

22  
23  
24 ADDITIONAL CASES NOT IDENTIFIED IN EITHER PETITION FOR COORDINATION

25 The Order of 7/1/20 assigning the coordination motion judge stated that the court  
26 reviewed its own records and identified cases that could be added to the coordinated proceeding.

1 These are not “included cases,” but can be added to the JCCP under CRC 3.531. Cases that are  
2 potential add-on cases include:

3  
4 Doe v. Doe, Alameda Case No. RG20065435

5 Doe v. Doe, Alameda Case No. RG20065437

6 Doe v. Doe, Alameda Case No. RG20065425

7 Doe v. Roe, Alameda Case No. RG20064685

8 Doe v. Doe, Alameda Case No. RG20064084

9 Doe v. Doe, Alameda Case No. RG20064221

10 Doe v. Roe, Alameda Case No. RG20064759

11  
12 THE INCLUDED CASES IN JCCP 5108 ARE COLLECTIVELY COMPLEX

13  
14 The included cases in JCCP 5108 (and JCCP 5114) are complex, given the large number  
15 of parties, potentially extensive motion practice raising difficult or novel legal issues, and  
16 potentially extensive discovery practice. (Cal. Rules of Court 3.400(b).) This Court previously  
17 managed Clergy III, JCCP 4359, and a review of the court’s own register of actions demonstrates  
18 that it was a complex matter. (Evid Code 452(d).)

19  
20 COORDINATION IN JCCP 5108 IS APPROPRIATE (CCP 404.1)

21  
22 Section 404.1 of the Code of Civil Procedure outlines various factors that the court must  
23 consider when ruling on a Petition of Coordination. Coordination is appropriate if it “will  
24 promote the ends of justice taking into account whether the common question of fact or law is  
25 predominating and significant to the litigation; the convenience of the parties, witnesses, and  
26 counsel, the relative development of the actions and the work product of counsel, the efficient



1 utilization of judicial facilities and manpower; the calendar of the courts; the disadvantages of  
2 duplicative and inconsistent rulings, orders, or judgments; and the likelihood of settlement of the  
3 actions without further litigation should coordination be denied.” (CCP § 404.1.) (See also *Ford*  
4 *Motor Warranty Cases* (2017) 11 Cal. App.5<sup>th</sup> 626.)

5         The included cases share common questions of law and some common issues of fact.  
6  
7         Although there is no doubt that numerous individual issues will ultimately have to be resolved in  
8 the included cases, that alone does not preclude coordination. (*McGhan Med. Corp. v. Superior*  
9 *Court* (1992) 11 Cal. App. 4<sup>th</sup> 804, 811-812.) The cases appear to be in all in their early stages.  
10 The cases will benefit from common and consistent orders on pleadings, discovery, and other  
11 matters. Coordination will provide substantial benefits to the efficient utilization of judicial  
12 facilities and manpower.

13         Courts in complex cases, coordinated or not, may approve stream-lined procedures  
14 including standardized complaints, plaintiff fact sheets and authorizations, and defendant fact  
15 sheets. In short, “the cases are ripe for coordination on discovery and related pretrial matters.”  
16 (*Ford Motor Warranty Cases* (2017) 11 Cal. App.5<sup>th</sup> 626, 642.) Thus “the benefits of early  
17 coordination of discovery and motion practice...are in no way negated by the court’s concern  
18 over litigation that is “heavily individualized ....” (*Ford Motor Warranty*, 11 Cal.App.5<sup>th</sup> at 643  
19 [quoting *McGhan*, 11 Cal.App.4<sup>th</sup> at 808].)

20  
21         Coordination would be more convenient for the parties, witnesses, and counsel.  
22  
23         Coordination would prevent duplicative depositions of key defendant witnesses. Coordination  
24 will ease the scheduling demands on counsel because multiple judges will not be setting different  
25 and potentially inconsistent timelines.  
26

1 Coordination has undeniable benefits in these cases. Coordination appears to be the most  
2 efficient utilization of judicial resources, taking into account the calendars of the courts and the  
3 disadvantages of duplicative and inconsistent rulings, orders or judgments.

4 The Court ORDERS that the included cases in JCCP 5108 are coordinated. (CCP 404.1;  
5 CRC 3.529.)  
6

7  
8 GEOGRAPHIC SCOPE OF COORDINATED PROCEEDING

9 The order of 7/1/20 setting the hearing on the petition to coordinate asked the parties to  
10 address the geographic scope of any coordinated proceeding. On reflection, the coordination  
11 motion judge does not need to, and does not, define the geographic scope of the coordinated  
12 proceeding. A JCCP is defined by (1) the identity of the included cases in the petition and (2) the  
13 identify of cases that are subsequently added to the JCCP. (CRC 3.521, 3.529(a), 3.531, 3.544.)  
14

15 The convenience of the parties, witnesses, and counsel, as well as the efficient utilization  
16 of judicial resources will require some discussion about which cases belong in Northern  
17 California Clergy Cases, JCCP 5108, Southern California Clergy Cases, JCCP 5101, and the  
18 Diocesan [San Diego] Cases, JCCP 5105.

19 At the hearing on 7/22/2020, there was general agreement among counsel that the County  
20 of filing define the JCCPs. One proposal was that JCCP 5108 include all cases filed in counties  
21 north of and including Monterey, Kings, Tulare, and Inyo Counties. The court does not decide  
22 that issue in this order. This will require discussion among the parties as well as among the  
23 coordination trial judges assigned to manage the JCCPs.  
24  
25  
26

1  
2 SUBJECT MATTER SCOPE OF COORDINATED PROCEEDING

3 The Judicial Council has identified the proceedings as Northern California Clergy Cases  
4 and Bay Area Clergy Cases. Complaints alleging childhood sexual assault as defined in CCP  
5 340.1(d) are not necessarily limited to clergy in any specific religious denomination or to clergy  
6 in religious institutions.  
7

8 The court does not limit the subject matter scope of the JCCP to clergy in religious  
9 institutions or to religious institutions in any specific religious denomination. The court will  
10 consider on a case specific basis whether any specific case should be added to the coordinated  
11 proceeding. (CRC 3.531, 3.544.)  
12

13 At the hearing on 7/22/2020, there was general agreement among counsel that the JCCP  
14 include claims against clergy and against religious institutions (regardless of denomination). The  
15 views were unclear or mixed about the management of cases involving against religious schools  
16 and other religious affiliated institutions. There was general agreement that the JCCP should not  
17 include claims against non-religious institutions such as schools, camps, and scouting  
18 organizations. Regarding schools specifically, there was concern that claims regarding schools  
19 would involve public entity law and that perhaps claims against public entities, if any, should be  
20 managed separately.  
21

22 LOCATION OF COORDINATED PROCEEDING  
23

24 The coordination motion judge must recommend a particular superior court for the site of  
25 the coordinated proceeding. (CRC 3.530.) The factors to consider include: (1) the number of  
26 included actions in particular locations; (2) whether the litigation is at an advanced stage in a

1 particular court; (3) the efficient use of court facilities and judicial resources; (4) the locations of  
2 witnesses and evidence; (5) the convenience of the parties and witnesses; (6) the parties' principal  
3 places of business; (7) the office locations of counsel for the parties; and (8) the ease of travel to  
4 and availability of accommodations in particular locations. (CRC 3.530(b).)

5 The coordination motion judge recommends that that proceeding be located in Alameda  
6 County. All counsel agreed that Alameda was the appropriate location for the JCCP.  
7

8 Alameda managed Clergy III, JCCP 4359. Alameda has institutional memory and  
9 experience in the form of court staff who worked on *Clergy III*. (*Center For Biological Diversity*  
10 *v. County of San Bernardino* (2010) 188 Cal.App.4th 603, 621 [appellate justices and trial court  
11 judges have “staff ... to help them identify errors in counsel's reasoning, misstatements of law  
12 and miscitations of authority, and to do original research to uncover ideas and authorities that  
13 counsel may have missed, or decided not to bring to the court's attention”].)  
14

15 The court is currently aware of more cases filed in Alameda than in San Francisco, but  
16 counsel states that dozens if not hundreds of additional cases might be filed and that they might  
17 be filed in many different counties. (Cunny Dec., para 19.) Alameda is marginally easier  
18 regarding ease of driving travel because it is closer to Contra Costa, Sacramento, and other  
19 counties to the east. All the identified cases appear to be at similar states of development, both  
20 courts have complex departments, both are equally convenient for parties and witness, both are  
21 the principal place of business for relevant defendant entities, and the office locations of counsel  
22 for the parties are throughout the state.  
23

24 ///

25 ///

1 DESIGNATION OF APPELLATE DISTRICT

2 The must designate a court of appeal for review of this order. (CCP 404.2.) The court  
3 selects the First District Court of Appeal for review of this order.

4 The court recommends that the Judicial Council designate a single District of the Court of  
5 Appeal as the intermediate reviewing court for all of (1) Southern California Clergy Cases, JCCP  
6 5101, (2) Diocesan [San Diego] Cases, JCCP 5105, (3) Northern California Clergy Cases, JCCP  
7 5108, and (4) Bay Area Clergy Case, JCCP 5114.

8  
9 When the Judicial Council created Clergy I (JCCP 4286), Clergy II (JCCP 4297), and  
10 Clergy III (JCCP 4359) in 2004, the Judicial Council apparently designated the Court of Appeal,  
11 Second District, as the common intermediate court of appeal. *Doe v. Roman Catholic Bishop of*  
12 *San Diego* (2009, 2<sup>nd</sup> Dist) 101 Cal.Rptr 3d 398 at fn 3 [unpublished] states:

13  
14 The cases in this appeal are among many from throughout the State against  
15 various entities and individuals affiliated with the Catholic Church for childhood  
16 sexual abuse. Those cases have been coordinated in the Los Angeles County  
17 Superior Court and formerly in the Alameda County Superior Court. Southern  
18 California cases are known as *Clergy Cases I* (JCCP No. 4286) and *Clergy Cases*  
*II* (JCCP No. 4297). The Bay Area cases are known as *Clergy Cases III* (JCCP  
19 No. 4359). The Second District of the Court of Appeal is the intermediate  
20 appellate court for all of the coordinated cases.

21 (See also *Hightower v. Roman Catholic Bishop of Sacramento* (2006, 2<sup>nd</sup> Dist) 142 Cal.App.4<sup>th</sup>  
22 759, 761 fn 1 [similar]; *Perez v. Roe I* (2006, 2<sup>nd</sup> Dist) 146 Cal.App.4<sup>th</sup> 171, 173 fn 3 [similar];  
23 (2006, 2<sup>nd</sup> Dist) 146 CalApp.4<sup>th</sup> 216, 220 fn 4 [similar].)

24 IT IS THEREFORE ORDERED:

- 25 1. The actions identified above in JCCP 5108 are complex (CRC 3.403);  
26 2. Coordination of these actions is appropriate and therefore the Petition for Coordination is

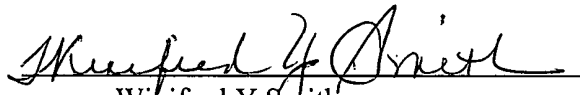
GRANTED (CCP 404.4; CRC 3.529);

- 1 3. All further proceedings in the included actions in JCCP 5108 are STAYED (CRC  
2 3.529(b));
- 3 4. Alameda County Superior Court is recommended as the coordination trial court for  
4 further proceedings in JCCP 5108 and its Local Rules shall be the rules applicable except  
5 where modified by order of the Coordination Trial Judge (CRC 3.530);
- 6 5. The First District Court of Appeal is selected as the reviewing court (CCP 404.2) for this  
7 order;
- 8 6. The court recommends that the Judicial Council designate a single District of the Court of  
9 Appeal as the intermediate reviewing court for all of (1) Southern California Clergy  
10 Cases, JCCP 5101, (2) Diocesan [San Diego] Cases, JCCP 5105, (3) Northern California  
11 Clergy Cases, JCCP 5108, and (4) Bay Area Clergy Case, JCCP 5114.
- 12 7. Petitioners in JCCP 5108 are ORDERED to promptly file this order in each included  
13 action in JCCP 5108, serve all parties in the included actions, serve all counsel who filed  
14 any objection to the petition, and submit this order to the Chair of the Judicial Council.  
15 (CRC 3.529)
- 16 8. Counsel for Petitioners in JCCP 5114, who filed an objection to the petition in JCCP  
17 5108, are ORDERED to promptly file this order in each included action in JCCP 5114  
18 and to promptly serve a copy of this order on all parties in JCCP 5114.
- 19 9. Counsel for any party identified in the petition in JCCP 5114 or in any case that (1)  
20 alleges childhood sexual assault as defined in CCP 340.1(d) and (2) is filed under the  
21 reprieve from the statute of limitations in CCP 340.1(q) as recently amended by AB 218  
22 may, after appointment of a coordination trial judge, request to coordinate any case as an  
23 add-on case. (CRC 3.544.) It appears that the add-on case procedure must wait until the  
24  
25  
26

1 appointment of the coordination trial judge. The coordination trial judge will determine  
2 whether JCCP 5108 is limited to cases with religious entity defendants.

3 10. The Court encourages distribution of this order widely, especially to counsel with any  
4 cases that are likely to be coordinated in these proceedings. All counsel with cases filed  
5 in Northern California that concern these proceedings are encouraged to attend further  
6 CMCs and hearings in the JCCP. The early participation of counsel in these coordinated  
7 proceedings will assist in moving the case forward. Counsel may attend hearings without  
8 entering a formal appearance.  
9

10  
11 Dated: July 22, 2020

12   
13 Winifred Y Smith  
14 Judge of the Superior Court  
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# EXHIBIT G



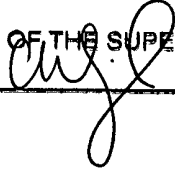


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**FILED**  
ALAMEDA COUNTY

AUG 10 2021

CLERK OF THE SUPERIOR COURT

By  Deputy

**SUPERIOR COURT OF THE STATE OF CALIFORNIA  
COUNTY OF ALAMEDA**

NORTHERN CALIFORNIA CLERGY  
CASES

Case No.: JCCP 5108  
Judge: Hon. Winifred Smith  
Department: 21

**STIPULATION AND [PROPOSED]  
ORDER RE: PRELIMINARY DISCOVERY  
PROCEDURES (FACT SHEETS,  
AUTHORIZATIONS, AND PRODUCTION  
OF DOCUMENTS)**

MANLY, STEWART & FINALDI  
ATTORNEYS AT LAW  
19100 Von Karman Avenue, Suite 800  
Irvine, CA 92612  
Telephone: (949) 252-9990

**WHEREAS** the Parties in this Coordinated Proceeding, pending in the Superior Court of California, County of Alameda, entitled *Northern California Clergy Cases*, JCCP Case No. 5108 ("the Litigation"), stipulate to the use of uniform Fact Sheets, uniform Request for Production of Documents, and the exchange of Authorizations for Consumer Records, as preliminary discovery

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**STIPULATION AND [PROPOSED] ORDER RE: PRELIMINARY DISCOVERY PROCEDURES (FACT  
SHEETS, AUTHORIZATIONS AND PRODUCTION OF DOCUMENTS)**

1 procedures, the Parties, therefore, enter this Stipulation to formalize those procedures, identify the  
2 form documents to be used and referenced, and specify the timeframes for the Parties to produce  
3 such documents. The Parties, by and through their respective Liaison Counsel, stipulate to the terms  
4 provided in the appended [Proposed] Order.

5 Dated: July 27, 2021

**MANLY, STEWART & FINALDI**

6  
7 By: /s/ Alex E. Cunny, Esq.  
JOHN C. MANLY, Esq.  
VINCE W. FINALDI, Esq.  
ALEX E. CUNNY, Esq.  
8 Plaintiffs' Co-Liaison Counsel  
9

10 Dated: July 27, 2021

**FURTADO JASPOVICE AND SIMONS**

11 By: /s/ Richard J. Simons, Esq.  
RICK J. SIMONS, Esq.  
12 Plaintiffs' Co-Liaison Counsel  
13

14 Dated: July 27, 2021

**WEINTRAUB TOBIN**

15 By: /s/ Daniel Zamora, Esq.  
PAUL GASPARI, Esq.  
DANIEL ZAMORA, Esq.  
16 Institutional Defendants' Liaison Counsel  
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**[PROPOSED] ORDER REGARDING FACT SHEETS, DOCUMENT PRODUCTIONS,  
AND AUTHORIZATIONS**

With **GOOD CAUSE** appearing therefor, the Court makes the following **ORDERS** to govern the preliminary reciprocal exchange of discovery information in this Litigation, pursuant to the Agreement of the Parties:

**I. GENERAL TERMS OF PRELIMINARY DISCOVERY**

A. In order to facilitate expedient exchange of essential information, evidence and documentation, the Parties have stipulated to the use of preliminary Fact Sheets, Requests for Production of Documents, and Authorizations for disclosure of Consumer Records, as identified below. These discovery procedures are implemented without prejudice to the parties to conduct further discovery in these actions.

B. The Court approves the following forms for use in this Litigation by the Parties:

1. Plaintiff Fact Sheet, attached hereto as **Exhibit "1"** to this Order;
2. Plaintiff Authorizations for:
  - i. Educational Records, attached as **Exhibit "2"** to this Order;
  - ii. Mental Health Records, attached as **Exhibit "3"** to this Order;
  - iii. Medical Records, attached as **Exhibit "4"** to this Order;
  - iv. Employment Records, attached as **Exhibit "5"** to this Order;
3. Initial Document Demand Sheet to Plaintiff, attached as **Exhibit "6"** to this Order
4. Institutional Defendant Fact Sheet, attached hereto as **Exhibit "7"** to this Order;
5. Requests for Production of Documents to Institutional Defendants, attached as **Exhibit "8"** to this Order;

C. Copies of each of these Exhibits (Exhibits 1 through 8) shall be served via CaseAnywhere, upon all parties within 2 calendar days of this Order, in Microsoft Word format by Plaintiffs Liaison Counsel.

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1 D. **Confidential Designations:** Exhibits “1” through “8” may be designated  
2 “Confidential” pursuant to the Court’s June 23, 2021 Protective Order Re: Confidential  
3 Information.

4 E. **Authorizations:** The Authorizations identified as Exhibits “2”, “3”, “4” and  
5 “5” are governed by the Court’s Order and Procedure Regarding “First Look” for Review of Those  
6 Consumer Records.

7 F. **Service of Fact Sheets, Production of Documents and Authorizations:** The Fact  
8 Sheets for both Defendants and Plaintiffs, Production of Documents for Plaintiffs and Defendants,  
9 and the Plaintiffs’ Authorizations are only to be served on the parties (or their counsel) in the  
10 underlying individual case and may be made available to Liaison Counsel only pursuant to the  
11 terms of the Protective Order entered in JCCP 5108. Service is accomplished by the uploading of  
12 the Fact Sheets, Documents, and Authorizations to the JCCP 5108 [www.caseanywhere.com](http://www.caseanywhere.com)  
13 website limited access page. The Responses are deemed served upon completion of the upload.  
14 Access to the limited rooms shall be restricted to: 1) Counsel in the individual case where the  
15 Responses are served; 2) counsel in other actions if the producing party permits them to have access,  
16 so as to avoid the burden on the producing party of having to “re-produce” documents that have  
17 already been produced in JCCP 5108; and 3) Liaison Counsel only pursuant to the terms of the  
18 Protective Order entered in JCCP 5108. In the event that, after the initial responses are served, the  
19 producing party wants to serve additional parties with previously produced documents, service shall  
20 be deemed complete upon email notification to CaseAnywhere requesting that additional counsel  
21 be provided with access to those previously produced documents. Such service is deemed complete  
22 upon that email communication by the serving party to [caseanywhere.com](http://caseanywhere.com) that the added-on party’s  
23 counsel is eligible to access the restricted Responses.

24 **II. TIME TO RESPOND TO PRELIMINARY DISCOVERY AND DATES**  
25 **TRIGGERING RESPONSES.**

26 A. The following are the timeframes and triggers for Parties to the preliminary  
27 documents governed by this Order:

28 ///

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1. **Preliminary Issues:** Prior to the service of discovery requests, or running of any discovery time periods for a particular action, the particular action must be (a) ordered added-on to JCCP 5108, (b) must have completed the certificate of merit process and duly served defendants with the complaint, and (c) Plaintiff must file and serve a Notice of Adoption for the Master Complaint. In addition, Plaintiff's Fact Sheet must identify the case name, case number and separately identify each defendant by his/her/its true name (not by "Doe" designation) for whom Plaintiff is seeking an initial disclosure response (production of priest file or personnel file, response to document requests and response to fact sheet).
2. **Plaintiff Fact Sheets And Authorizations:** Each Plaintiff that is "Added-On" to this Coordinated Proceeding and has filed a Notice of Adoption Form is ordered to serve a response to a Plaintiff Fact Sheet (Exhibit "1"), provide all applicable authorizations (Exhibits "2" to "5"), and serve a response to the Initial Document Demand Sheet to Plaintiff (Exhibit "6"), to those referenced in Section I(F) *supra*, as follows:
  - a. If a Plaintiff has been "Added-On" to the Litigation and filed a Notice of Adoption Form at the time of this Order, the Plaintiff is ordered to serve a response to a Plaintiff Fact Sheet (Exhibit "1"), provide all applicable authorizations (Exhibits "2" to "5"), and serve a response to the Initial Document Demand Sheet to Plaintiff (Exhibit "6"), within sixty (60) days of this Order.
  - b. If a Plaintiff is, subsequent to this Order, "Added-On" to the Litigation, the Plaintiff is ordered to serve a response to a Plaintiff Fact Sheet (Exhibit "1"), provide all applicable authorizations (Exhibits "2" to "5"), and serve a response to the Initial Document

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Demand Sheet to Plaintiff (Exhibit “6”), within sixty (60) days of their Notice of Adoption Form being filed with the Court.<sup>1</sup>

3. **Institutional Defendants’ Production of Priest Files or Personnel File on Accused Individuals:** Each Institutional Defendant is ordered to serve, if any exist, the priest file or personnel file for the individual(s) accused of abusing the particular plaintiff in the action within sixty (60) days of being served with the response to the Plaintiff Fact Sheet and response to the Initial Document Demand Sheet to Plaintiff in that particular case. Service of the Priest File or Personnel File is to be made to the individuals identified in Section I (F) *supra*;

4. **Institutional Defendants’ Written Responses to Document Requests, Production of Remaining Documents and Defendant Fact Sheet:**

Each Institutional Defendant is ordered to serve responses, and produce applicable documents requested in Requests for Production of Documents to Institutional Defendants (Exhibit “8”) and responses to the Institutional Defendant’s Fact Sheet (Exhibit “7”) within ninety (90) days of being served with response to the Plaintiff Fact Sheet and response to the Initial Document Demand Sheet to Plaintiff in a particular case. Service of the response to Requests for Production of Documents to Institutional Defendants, production of applicable documents, and the response to Defendant’s Fact Sheet is to be made to the individuals identified in Section I(F) *supra*.

B. The timeframes mentioned above in Paragraphs II(A), are subject to extension for “good cause” through stipulation of the Parties, or through subsequent Order of the Court.

C. All objections by Plaintiffs and Defendants to the requests in the Production of Documents and questions in the Fact Sheets themselves, to any responses to the Production of

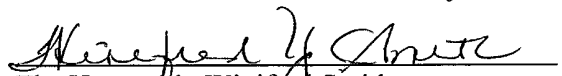
<sup>1</sup> Pursuant to the Order Approving the Master Complaint and Notice of Adoption Forms, dated March 25, 2021 (specifically, Paragraph 3), a Plaintiff is Ordered to serve an Adoption Form no later than forty-five (45) days after Notice of the Order Adding the Matter Onto the Litigation is given.  
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1 Documents and Fact Sheets, and to the production of any documents, are preserved. Any  
2 withholding of documents and/or information must comport with the requirements for doing so  
3 under the California Civil Discovery Act, and furthermore, the withholding of documents on the  
4 basis of privilege must be supported with a Code-Compliant Privilege Log pursuant to *Code of*  
5 *Civil Procedure* §2031.240(c) or sufficient foundational information to evaluate the privilege.

6 D. Disputes as to the responses to the Production of Documents, Fact Sheet Responses,  
7 and Authorizations are to be dealt with through Department 21's informal discovery procedures,  
8 subject to increased page limitations, use of exhibits, and/or joint briefing on common issues  
9 involving multiple parties in the coordination proceeding. In the event the matter cannot be  
10 informally resolved, Liaison Counsel shall advise the Court of such disputes for necessity of motion  
11 practice, in the Joint Status Conference statement. These disputes shall be adjudicated through the  
12 Coordination Trial Judge and/or her designee.

13 **IT IS SO ORDERED.**

14  
15 Date: August 10, 2021

  
16 The Honorable Winifred Smith  
17 Coordination Trial Judge

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# EXHIBIT "1"



**SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF ALAMEDA**

COORDINATION PROCEEDING SPECIAL  
TITLE (Rule 3.550)

**NORTHERN CALIFORNIA CLERGY  
CASES**

JCCP NO. 5108

THIS DOCUMENT RELATES TO:

*All Included Actions And Related Cases*

**PLAINTIFF'S FACT SHEET**

**Instructions:** Please answer the following questions to the best of your ability.

The term "document," as used in this Plaintiff Fact Sheet form, means any writing or record of every type that is in your possession or has ever been in your possession (even if, for example, you later provide it, or a copy of it, to your lawyer or someone else from whom you can retrieve it), including any printed, typewritten, handwritten, computer created, or machine generated documentation or manner of reproduction, such as handwritten notations, diaries, calendar notations, appointment books, letters, memoranda, e-mails, text messages, cassettes, videotapes, DVDs, photographs, charts, computer discs or tapes, x-rays, drawings, graphs, phonograph records, data processing reports, and forms, data compilations from which information can be obtained or translated through detection devices into reasonable useable forms, diagrams, symbols, telegrams, telexes, telephone records or logs. These are just examples of items that may constitute a "document" within the meaning of the requests in this form.

The term "complaint," when used herein, refers to your written Complaint in this action, as most recently amended at the time of your response to these questions, including your Notice of Adoption of the Master Complaint.

The term "perpetrator," when used herein, refers to the person or persons you allege in your complaint to have abused you, and whose conduct you contend forms the basis for liability in this action.

In responding to these questions, you are required to provide all information available to you. You are to exercise due diligence to secure the information requested, providing all information in your possession or under your control. Information under your control includes employment, medical, Social Security and other records available to you if sought, even though you may not presently possess copies of such records. If you do not have personal knowledge sufficient to fully respond

to a question, you are required to make a reasonable and good faith effort to obtain the information by inquiry to other natural persons or organizations, including family members.

You may attach as many sheets of paper as necessary to fully answer the questions below.

The information you provide in response to this Plaintiff Fact Sheet constitutes your response, under oath, to discovery in this case, subject to California Code of Civil Procedure Sections 2030-2031 et seq., based on your current personal knowledge. Pursuant to California Code of Civil Procedure Section 2030.230, you may elect, in these responses, to specify the document or documents from which information responsive to the request may be derived or ascertained if responding with the requested information would require you to summarize the information from the document or documents.

**The answers you provide to this Plaintiff Fact Sheet are under oath, and you certify them to be true and correct to the best of your knowledge as of the time of completion.**

## PLAINTIFF'S FACT SHEET COVER PAGE

PLAINTIFF UNIQUE ID NO. \_\_\_\_\_

PLAINTIFF TRUE NAME: \_\_\_\_\_

### DEFENDANTS:

Defendant Pseudonym (If Applicable)		Defendant True Name	
1.	_____	1.	_____
2.	_____	2.	_____
3.	_____	3.	_____
4.	_____	4.	_____
5.	_____	5.	_____
6.	_____	6.	_____
7.	_____	7.	_____
8.	_____	8.	_____
9.	_____	9.	_____
10.	_____	10.	_____

**I. PRELIMINARY CASE-RELATED INFORMATION**

- A. Full name of Plaintiff (first, middle, last): \_\_\_\_\_
- B. Other names used (include dates other names used): \_\_\_\_\_
- C. Case caption and civil action no.: \_\_\_\_\_
- D. Your lawyer's name(s): \_\_\_\_\_
1. Law Firm(s): \_\_\_\_\_
2. Address: \_\_\_\_\_
3. Telephone number: \_\_\_\_\_
4. Fax number: \_\_\_\_\_
5. E-mail address(es): \_\_\_\_\_

**II. PLAINTIFF'S PERSONAL INFORMATION**

- A. Current City/State of Residence: \_\_\_\_\_
- B. Social Security Number: \_\_\_\_\_
- C. Date and place of birth: \_\_\_\_\_
- D. Sex: Male \_\_\_\_\_ Female \_\_\_\_\_
- E. Current Marital Status: \_\_\_\_\_
- F. Identify each address at which you have resided during the last 10 years, starting with your current address and state when you started and stopped living at each one:

Street Address	City/State	Dates of Residence

- G. Education History: Identify each educational or occupational training institution you have attended beginning with grammar school, including the dates of attendance, courses of study pursued, and diplomas or degrees received:
1. Grammar School(s):
- a. Name: \_\_\_\_\_

- b. Address: \_\_\_\_\_
  - c. Grade completed: \_\_\_\_\_
  - d. Dates of Attendance: \_\_\_\_\_
- 2. Middle School or Junior High School:
  - a. Name: \_\_\_\_\_
  - b. Address: \_\_\_\_\_
  - c. Grade completed: \_\_\_\_\_
  - d. Dates of Attendance: \_\_\_\_\_
- 3. High School:
  - a. Name: \_\_\_\_\_
  - b. Address: \_\_\_\_\_
  - c. Grade completed: \_\_\_\_\_
  - d. Dates of Attendance: \_\_\_\_\_
- 4. College:
  - a. Name: \_\_\_\_\_
  - b. Address: \_\_\_\_\_
  - c. Dates of Attendance: \_\_\_\_\_
  - d. Degree awarded and major: \_\_\_\_\_
- 5. Other:
  - a. Name: \_\_\_\_\_
  - b. Address: \_\_\_\_\_
  - c. Dates of Attendance: \_\_\_\_\_
  - d. Degree awarded: \_\_\_\_\_
- 6. Other:
  - a. Name: \_\_\_\_\_

b. Address: \_\_\_\_\_

c. Dates of Attendance: \_\_\_\_\_

d. Degree awarded: \_\_\_\_\_

H. Employment: For each employer since you were 18 years of age, please state:

Name of Employer	Address	Dates of Employment	Occupation/Duties

*\*Please attach additional pages to identify employment information, as necessary.*

I. Driver's license number and issuing state: \_\_\_\_\_

J. Military service

1. Have you ever served in any branch of the U.S. Military? \_\_\_\_\_

2. If you answered "yes," please state

a. The branch and the dates of service: \_\_\_\_\_

b. Were you discharged for any reason relating to a physical, psychiatric or emotional condition of the kind for which you are now claiming damages? \_\_\_\_\_

c. If "yes," please state what that condition was: \_\_\_\_\_

3. Have you ever been rejected from military service for any reason relating to a physical, psychiatric or emotional condition of the kind for which you are now claiming damages? Yes \_\_\_\_\_ No \_\_\_\_\_

4. If "yes," please state what that condition was.

K. Other Claims/Litigation

1. Have you ever filed a lawsuit or made a claim, other than in the present lawsuit, seeking civil/monetary damages?

a. Yes \_\_\_\_\_ No \_\_\_\_\_

2. If you answered "yes," then identify the following as to each:

Caption & Case No.	Date Filed	Nature of Action	Outcome	Lawyer's name & address

### III. COMPLAINT ALLEGATIONS

A. Identity of Perpetrator.

1. Identify the perpetrator(s) of the purported incident(s) of sexual abuse giving rise to this action. \_\_\_\_\_

2. Identify the name of the institution(s) with which you contend the perpetrator was associated. \_\_\_\_\_

3. Specify the perpetrator's relationship with the institution at time of the incident. \_\_\_\_\_

B. Relationship to Perpetrator. How did you initially become acquainted with the individual(s) that you identified in your response to the previous question?

1. Approximate date you became acquainted: \_\_\_\_\_

2. Your age at the time: \_\_\_\_\_

3. The location where you became acquainted: \_\_\_\_\_

C. Description of Abuse. Generally describe the incidents of sexual abuse giving rise to this action. Your description should include the date the sexual abuse began, your age at the time the sexual abuse began, the time period the sexual abuse lasted, the nature of the abuse including the conduct that you contend constituted sexual abuse, (fondling, touching, oral copulation, penetration), the circumstances surrounding the abuse, and the location where the abuse occurred.

1. Dates of the initial instance of childhood sexual assault:

\_\_\_\_\_

2. Your age at the time the childhood sexual assault began:

\_\_\_\_\_

3. Dates of the last instance of childhood sexual assault: \_\_\_\_\_

4. Age at the time sexual abuse stopped: \_\_\_\_\_

5. On how many separate occasions do you claim the perpetrator sexually assaulted you as a minor?

6. Describe the conduct that you contend constituted sexual abuse or sexual assault allegedly perpetrated by the perpetrator against you: This should include a detailed description of the type of abuse (fondling, touching, oral copulation, penetration, etc.):

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7. Identify the location(s) where the childhood sexual assault took place as described in your answers above: \_\_\_\_\_

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*\*Please attach additional pages if necessary to describe the abuse alleged in your complaint.*

D. Knowledge and Complaints of Abuse.

1. Have you personally made a complaint or otherwise had any direct communication, oral or written, with any of the Defendants with respect to the sexual abuse perpetrated against you? ( ) Yes ( ) No

2. If yes, and the complaint or communication was in writing, please attach a copy or copies of any written complaint or communication.



3. If yes, please identify by name and/or title/job description, if known, and/or by physical appearance, to whom the complaint or other communication was made or directed, including the type of communication. \_\_\_\_\_

4. If yes, please identify when the complaint or other communication took place and provide the date of the complaint or communication, if known: \_\_\_\_\_

5. If the complaint or other communication was oral or the written communication is no longer available, please describe the complaint or other communication as best you can: \_\_\_\_\_

6. If you answer yes to question D1 above, did you receive a response, orally or in writing, to your complaint or other communication? ☐ Yes ☐ No.

7. If yes, and response was in writing, please attach a copy of the written response.

8. If yes, and the response was made orally or if the written response is no longer in your possession, or the possession of your lawyer or anyone else from whom you can retrieve it, please identify from whom you received a response, the date of such response, and the details of the response including the mode of the response. \_\_\_\_\_

9. Are you aware of anyone else (other than your lawyers) who had any direct communication, oral or written, with any of the Defendants or any of the Defendants' staff or representatives, with respect to the alleged sexual abuse perpetrated against you?

☐ Yes ☐ No.

10. If yes, please identify the individual(s) who had the direct communication and type of communication. \_\_\_\_\_

11. Did you communicate with anyone else, other than Defendants, either orally or in writing, (other than your attorneys) about the abuse described above?

☐ Yes ☐ No.

12. Identify each and every individual with whom you were residing during the time period in which the abuse is alleged to have occurred. Your identification should include name, relationship, current address. No family members will be contacted by Defendant without advising your attorney in advance.

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13. Did you or any family member or other individual inform law enforcement and/or child welfare authorities of the alleged abuse? \_\_\_\_\_

a. If yes, describe all facts and circumstances concerning whether any person associated with law enforcement and/or child welfare authorities was informed of your alleged abuse. Include the identity of every person associated with law enforcement and/or child welfare authorities who was informed of the alleged abuse, the date of such notification, who it was that notified that person, how that notification occurred, and what information you have as to what response occurred. \_\_\_\_\_

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14. Are you aware of any individual who witnessed any instance of the alleged sexual abuse giving rise to this action? If yes, identify that individual(s) and describe the manner and circumstances through which each such individual witnessed the alleged sexual abuse.

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15. Have you (and not your lawyers) obtained any oral or written statements from any person(s) not a party to this action concerning the perpetrator or any of the Defendants and the abuse committed by the perpetrator?

Yes ( ) No.( ) If yes, please attach a copy.

16. Please identify by name, address and telephone number, if known, or by other description, any and all individual with whom you personally communicated about the abuse perpetrated against you and describe the manner of communication.

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#### IV. DAMAGES/INJURIES

A. What injuries (physical, emotional/psychological, and/or economic) do you contend you suffered because of the Defendants' conduct? \_\_\_\_\_

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B. Have you sought treatment and/or counseling from any healthcare provider (e.g., doctor, nurse, therapist, etc.) for these injuries?

1. Yes \_\_\_ No \_\_\_

C. If yes, please describe with particularity below:

Date	Name of Provider(s)	Address and Phone Number	Nature of Treatment

*\*Please attach additional pages to identify providers who treated you, if necessary*

- D. If you have incurred any expenses you attribute to the injuries you claim to have sustained, please itemize such expenses to the extent possible. *(Please maintain and preserve a copy of all documents that show these expenses and include those documents in your response to this Fact Sheet).* \_\_\_\_\_

- E. Have you seen a mental healthcare provider (including, but not limited to, a psychiatrist, psychologist, licensed marriage and family therapist (LFMT), licensed clinical social worker (LCSW) and/or counsel) for any mental or emotional injuries you believe may have been caused by the sexual abuse you suffered?

Yes \_\_\_\_ No \_\_\_\_

- F. If yes, please provide the following information:

Date(s) of Treatment	Name of Mental HealthCare Provider	City/State/Country	Discussed Experience of Abuse	Diagnosis (if any)

*\*Please attach additional pages to identify additional mental healthcare providers, if necessary.*

- G. If your answer to part E was yes, have you ever seen a mental healthcare provider or sought treatment, counseling, or therapy for any other reason?

Yes \_\_\_\_ No \_\_\_\_

- H. If yes, please provide the following information:

Date(s) of Treatment	Name of Mental HealthCare Provider	City/State/Country	Discussed Experience of Abuse	Diagnosis (if any)

*\*Please attach additional pages to identify additional mental healthcare providers, if necessary.*

I. Medical history

1. Please list all physical, mental, and emotional disabilities you had immediately before the dates of the abuse alleged in your complaint: \_\_\_\_\_

\_\_\_\_\_

V. **LOSS OF EARNINGS OR EARNING CAPACITY**

- A. Do you attribute any lost income or earnings to the injuries you suffered as a result of the childhood sexual assault by the perpetrator?

Yes \_\_\_\_ No \_\_\_\_

If you answered "yes," please state:

The nature of your work where you have lost income or lost capacity for income or earnings:

\_\_\_\_\_

Your job title for each position:

\_\_\_\_\_

The date your employment began:

\_\_\_\_\_

The dates during which you lost earnings, stating whether the loss for each period was from unemployment or diminished performance or attendance:

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

State the total amount of earnings that you lost to date:

\_\_\_\_\_

State how you calculated the earnings:

\_\_\_\_\_

- B. Are you claiming a loss of earning capacity or loss of future income as a result of the childhood sexual assault by the perpetrator?

Yes \_\_\_\_ No \_\_\_\_

If you answered "yes," please state:

The facts upon which you base this claim:

---

An estimate of the amount:

---

How the claim for future income is calculated:

---

- C. Do you claim that the injuries you suffered as a result of the childhood sexual assault by the perpetrator interfered with any career opportunities or prevented you from pursuing career opportunities you would have otherwise pursued?

Yes \_\_\_\_ No \_\_\_\_

If yes, then please describe, as completely and in as much detail as possible, the particular career opportunities in question, and explain how your injuries interfered with those career opportunities or prevented you from pursuing those career opportunities you have otherwise pursued:

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**VI. OTHER DAMAGES**

- A. Are there any other damages that you attribute to the incident?

Yes \_\_\_\_ No \_\_\_\_

If your answer is "no," do not answer the questions in this section.

\_\_\_\_\_  
Full Name  
\_\_\_\_\_  
Social Security Number  
\_\_\_\_\_  
Date of Birth

**AUTHORIZED IN CONNECTION WITH**

*In Re Northern California Clergy Cases;*  
Alameda County Superior Court,  
Case No. JCCP 5108

**AUTHORIZATION FOR RELEASE OF EDUCATIONAL RECORDS**

To: \_\_\_\_\_  
**Name of Entity**  
\_\_\_\_\_  
**Address**  
\_\_\_\_\_  
**City, State, Zip Code**

I hereby authorize the firm of [INSERT DEFENSE FIRM NAME, FIRM ADDRESS, FIRM TELEPHONE NUMBER], or any other member, associate or designee of the firm, and any subpoena company working for the firm, to be furnished copies of my educational records, including but not limited to academic evaluations, including student examination papers, transcripts, test scores and other academic records, general counseling and advising records, disciplinary records, financial aid records, including student loan collection records and monies earned from the academic institution through work study programs or other employment, documents relating to attendance, leave of absences (whether for vacation, sick leave or other reasons), class lists, student course schedules, reported injuries, performance evaluations, health examinations or other medical, psychological and/or health records maintained by the institution. These records should include any information recorded in any way, including but not limited to, handwriting, print, computer media, videotape, audiotape, film, microfilm, microfiche, and e-mail. The defendant in the above lawsuit has agreed to pay reasonable charges to supply copies of such records.

This authorization is being given at my request in conjunction with the civil litigation matter listed above. Therefore, this authorization shall expire upon the final resolution by all parties of the aforementioned civil litigation, either by final judicial order, final settlement agreement, final judicial dismissal, or by other final judicial order, including but not limited to the resolution of any and all appeals. Until then, this authorization shall be considered as continuing, and you may rely on it in all respects unless and until you have been advised by me in writing to the contrary. Please note that this authorization also permits you to release any records created or obtained by you after the date of execution of this authorization.

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It is expressly understood and intended by the undersigned that you are hereby authorized to accept a copy or photocopy of this authorization with the same validity as though an original had been presented to you.

Name of Former or Current Student	Signature	Date of Birth	Date Signed
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# EXHIBIT "3"

\_\_\_\_\_  
Full Name  
\_\_\_\_\_  
Social Security Number  
\_\_\_\_\_  
Date of Birth

**AUTHORIZED IN CONNECTION WITH**

*In Re Northern California Clergy Cases,*  
Alameda County Superior Court,  
Case No. JCCP 5108

**AUTHORIZATION FOR RELEASE OF MENTAL HEALTH RECORDS**

**In Compliance With the Health Insurance Portability  
and Accountability Act of 1996 (HIPAA)**

To: \_\_\_\_\_  
**Name of Entity**  
\_\_\_\_\_  
**Address**  
\_\_\_\_\_  
**City, State, Zip Code**

Pursuant to the **Health Information Portability and Accountability Act (HIPAA) Privacy Regulations**, 45 CFR § 164.508; you are hereby authorized to release my entire medical records file to the Records Requester listed below. This release authorizes you to furnish copies of any information, including but not limited to medical records, psychotherapy notes, and clinical information concerning the assessment, evaluation, treatment, and/or hospitalization related to mental health or psychiatric illnesses or conditions.

This authorization is being given at my request in conjunction with the civil litigation matter listed above and no other purpose. You are hereby authorized to release these medical records to the following Records Requester for their use in the above-entitled litigation. The defendant in the above lawsuit has agreed to pay reasonable charges to supply copies of such records. Copies of any records obtained will be provided, per agreement, to my legal counsel. You should provide all documents and information to:

**Records Requester**

1. [INSERT DEFENDANT'S ATTORNEY NAME, FIRM NAME, FIRM ADDRESS AND FIRM TELEPHONE NUMBER], or any member, associate or designee of the law firm, and any subpoena company working for the firm.

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I understand that the health information being disclosed by these psychotherapy notes may include information relating to and treatment of Human Immunodeficiency Virus (HIV), Acquired Immune Deficiency Syndrome (AIDS), sexually transmitted diseases and drug and alcohol use.

I understand that this authorization pertains only to the civil litigation referenced above. Therefore, this authorization shall expire upon the final resolution by all parties of the aforementioned civil litigation, either by final adjudication, final settlement agreement, final judicial dismissal, or by other final judicial order, including but not limited to the resolution of any and all appeals. I understand that this authorization remains in full force and effect until such expiration or revocation, as more fully described below, and further authorizes you to release to the Records Requester any additional records created or obtained by you after the date of execution of this authorization. I understand and intend that you may rely on this authorization in all respects unless you have previously been advised by me in writing to the contrary.

I understand that I may revoke this authorization at any time by providing you a written revocation, but that my revocation will be effective only to the extent, that the information has not already been released. I further understand that the covered entity to whom this authorization is directed may not condition treatment, payment, enrollment or eligibility benefits on whether or not I sign this authorization.

It is expressly understood and intended by the undersigned that you are hereby authorized to accept a copy or photocopy of this authorization with the same validity as though an original had been presented to you.

I understand that any documents or information released by you could potentially be re-disclosed by the aforementioned Records Requester and that any information re-disclosed by that party is not subject to this authorization and may not be subject to HIPAA, the Federal Regulations promulgated under the authority of HIPAA, and more specifically, the requirements imposed by 45 C.F.R. § 164.508.

This authorization shall not be valid unless the Records Requester named above has executed the acknowledgment at the end of this authorization.

This authorization is executed and served in compliance with HIPAA, the Federal Regulations promulgated thereunder, and more specifically, 45 C.F.R. § 164.508, all of which govern the requirements for the release of private health information

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Name of Patient	Signature	Date of Birth	Date Signed
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**ACKNOWLEDGMENT**

The undersigned, as the Records Requester named in the above medical authorization, hereby declares under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the attorney for the patient named in the foregoing medical authorization has been given notice that the authorization will be used to request records and information from the person or entity to whom it is addressed. The attorney for or the person named in the foregoing medical authorization has also been afforded an opportunity to order copies of the records requested from the undersigned requester at a reasonable cost.

Date: \_\_\_\_\_

Records Requester's Signature: \_\_\_\_\_

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# EXHIBIT "4"

\_\_\_\_\_  
Full Name  
\_\_\_\_\_  
Social Security Number  
\_\_\_\_\_  
Date of Birth

**AUTHORIZED IN CONNECTION WITH**

*In Re Northern California Clergy Cases,*  
Alameda County Superior Court,  
Case No. JCCP 5108

**AUTHORIZATION FOR RELEASE OF MEDICAL RECORDS**

**In Compliance With the Health Insurance Portability  
and Accountability Act of 1996 (HIPAA)**

To: \_\_\_\_\_  
**Name of Entity**  
\_\_\_\_\_  
**Address**  
\_\_\_\_\_  
**City, State, Zip Code**

Pursuant to the **Health Information Portability and Accountability Act (HIPAA) Privacy Regulations**, 45 CFR § 164.508, you are hereby authorized to release my entire medical records file to the Records Requester listed below. This release authorizes you to furnish copies of all medical records, including but not limited to medical history or examination reports and notes, laboratory reports, pathology slides, reports, notes and specimens, radiographic films, CT scans, X-rays, MRI films, MRA films, correspondence, progress notes, prescription records, echocardiographic recordings, written statements, employment records, wage records, insurance, substance-use disorder records, Medicare, Medicaid and disability records, and medical bills regarding my injuries, diseases, diagnoses, or treatment. This authorization does not extend to psychotherapy notes, as that term is defined in the HIPAA Privacy Rules, 45 C.F.R. §164.501, to mean notes recorded in any medium by a health care provider who is a mental health professional, documenting or analyzing the contents of conversation during private, joint or group counseling sessions, and which are kept separate from my medical records.

This authorization is being given at my request in conjunction with the civil litigation matter listed above and no other purpose. You are hereby authorized to release these medical records to the following Records Requester for their use in the above-entitled litigation. [INSERT DEFENDANT'S NAME], a defendant in the above lawsuit, has agreed to pay reasonable charges to supply copies of such records. Copies of any records obtained will be

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provided, per agreement, to my legal counsel. You should provide all documents and information to:

**Records Requester**

1. [INSERT DEFENDANT'S ATTORNEY NAME, FIRM NAME, FIRM ADDRESS AND FIRM TELEPHONE NUMBER], or any member, associate or designee of the law firm, and any subpoena company working for the firm.

I understand that the health information being used/disclosed may include information and/or records relating to and treatment of Human Immunodeficiency Virus (HIV), Acquired Immune Deficiency Syndrome (AIDS), sexually transmitted diseases and drug and alcohol use.

I understand that this authorization pertains only to the civil litigation referenced above. Therefore, this authorization shall expire upon the final resolution by all parties of the aforementioned civil litigation, either by final adjudication, final settlement agreement, final judicial dismissal, or by other final judicial order, including but not limited to the resolution of any and all appeals. I understand that this authorization remains in full force and effect until such expiration or revocation, as more fully described below, and further authorizes you to release to the Records Requester any additional records created or obtained by you after the date of execution of this authorization. I understand and intend that you may rely on this authorization in all respects unless you have previously been advised by me in writing to the contrary.

I understand that I may revoke this authorization at any time by providing you a written revocation, but that my revocation will be effective only to the extent that the information has not already been released. I further understand that the covered entity to whom this authorization is directed may not condition treatment, payment, enrollment or eligibility benefits on whether or not I sign this authorization.

I understand that any documents or information released by you could potentially be re-disclosed by the aforementioned Records Requester and that any information re-disclosed by that party is not subject to this authorization. I expressly permit the Records Requester to re-disclose my medical records file for purposes limited only to this civil litigation matter and only to the extent necessary and further limited to medical-related consultants and/or experts of the Records Requester or related to [INSERT NAME OF DEFENDANT]'s obligations to provide information to any federal or state authorities if required by law. I grant this permission only on the condition that the Records Requester mark each and every page of my records with a stamp designating them as "Confidential."

This authorization shall not be valid unless the Records Requester named above has executed the acknowledgment at the end of this authorization.

This authorization is executed and served in compliance with HIPAA, the Federal Regulations promulgated thereunder, and more specifically, 45 C.F.R. § 164.508, all of which govern the requirements for the release of private health information

Name of Patient	Signature	Date of Birth	Date Signed
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### **ACKNOWLEDGMENT**

The undersigned, as the Records Requester named in the above medical authorization, hereby declares under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the attorney for the patient named in the foregoing medical authorization has been given notice that the authorization will be used to request records and information from the person or entity to whom it is addressed. The attorney for or the person named in the foregoing medical authorization has also been afforded an opportunity to order copies of the records requested from the undersigned requester at a reasonable cost.

Date: \_\_\_\_\_

Records Requester's Signature: \_\_\_\_\_

# EXHIBIT "5"

\_\_\_\_\_  
Full Name  
\_\_\_\_\_  
Social Security Number  
\_\_\_\_\_  
Date of Birth

**AUTHORIZED IN CONNECTION WITH**

*In Re Northern California Clergy Cases,*  
Alameda County Superior Court,  
Case No. JCCP 5108

**AUTHORIZATION FOR RELEASE OF EMPLOYMENT RECORDS**

To: \_\_\_\_\_  
**Name of Entity**  
\_\_\_\_\_  
**Address**  
\_\_\_\_\_  
**City, State, Zip Code**

I hereby authorize the firm of [INSERT DEFENSE FIRM NAME, FIRM ADDRESS, FIRM TELEPHONE NUMBER], or any other member, associate or designee of the firm, and any subpoena company working for the firm, to be furnished copies of my entire personnel file, including but not limited to documents relating to attendance, leave of absences (whether for vacation, sick leave or other reasons), reported injuries, promotions and demotions, performance evaluations, reports of health examinations, job applications, and wages paid and/or earnings given (including W-2 forms), and all other pertinent documents, including any and all medical, psychological, or testing records or memoranda. The defendant in the above lawsuit has agreed to pay reasonable charges to supply copies of such records.

This authorization is being given at my request in conjunction with the civil litigation matter listed above. Therefore, this authorization shall expire upon the final resolution by all parties of the aforementioned civil litigation, either by final judicial order, final settlement agreement, final judicial dismissal, or by other final judicial order, including but not limited to the resolution of any and all appeals. Until then, this authorization shall be considered as continuing, and you may rely on it in all respects unless and until you have been advised by me in writing to the contrary. Please note that this authorization also permits you to release any records created or obtained by you after the date of execution of this authorization.

It is expressly understood and intended by the undersigned that you are hereby authorized to accept a copy or photocopy of this authorization with the same validity as though an original had been presented to you.

Name of Employee /Former Employee	Signature	Date of Birth	Date Signed
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# EXHIBIT "6"

**SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF ALAMEDA**

COORDINATION PROCEEDING SPECIAL  
TITLE (Rule 3.550)

**NORTHERN CALIFORNIA CLERGY  
CASES**

JCCP NO. 5108

THIS DOCUMENT RELATES TO:

*All Included Actions And Related Cases*

**INITIAL DOCUMENT DEMAND SHEET TO PLAINTIFF**

The term “document,” as used in this Document Demand Sheet, means any writing or record of every type that is in your possession or has ever been in your possession (even if, for example, you later provide it, or a copy of it, to your lawyer or someone else from whom you can retrieve it), including any printed, typewritten, handwritten, computer created, or machine generate documentation or manner of reproduction, such as handwritten notations, diaries, calendar notations, appointment books, letters, memoranda, e-mails, text messages, cassettes, videotapes, DVDs, photographs, charts, computer discs or tapes, x-rays, drawings, graphs, phonograph records, data processing reports, and forms, data compilations from which information can be obtained or translated through detection devices into reasonable useable forms, diagrams, symbols, telegrams, telexes, telephone records or logs. These are just examples of items that may constitute a “document” within the meaning of the requests in this form.

The terms “complaint” when used herein, refers to your written Complaint in this action, as most recently amended at the time of your response to these questions, including your Notice of Adoption of the Master Complaint.

The term “perpetrator,” when used herein, refers to the person or persons you allege in your complaint to have abused you, and whose conduct you contend forms the basis for liability in this action.

In responding to these questions, you are required to provide all information available to you. You are to exercise due diligence to secure the information requested, providing all information in your possession or under your control. Information under your control includes employment, medical, Social Security and other records available to you if sought, even though you may not presently possess copies of such records. If you do not have personal knowledge sufficient to fully respond

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to a question, you are required to make a reasonable and good faith effort to obtain the information by inquiry to other natural persons or organizations, including family members.

The information you provide in response to this Document Demand Sheet is being provided pursuant to of California Code of Civil Procedure sections 2031.010, et seq., and constitutes your response, under oath, to discovery in this case, based on your current personal knowledge, and you certify them to be true and correct to the best of your knowledge as of the time of completion. Please verify your written response under oath.

Please produce all documents in your custody, possession or control that are responsive to the following requests, together with a sworn statement of compliance pursuant to California Code of Civil Procedure sections 2031.210, et seq., that the documents produced are true copies of the originals or that, as to the documents not produced, a representation of an inability to comply.

1. All documents exchanged between you and your perpetrator.
2. All documents constituting communications between you and any representative, agent or employee of the defendant related to the allegations of childhood sexual assault in your complaint.
3. All documents constituting communications by you with anyone related to your childhood sexual assault in your complaint, other than with your counsel, including any communications with law enforcement or other alleged victims.
4. All documents supporting the contention that Defendant knew or should have known about your perpetrator's sexual propensity prior to your last act of childhood sexual assault.
5. All documents supporting the contention that Defendant ratified your alleged childhood sexual assault.
6. All documents related to your attendance at any parish, church or school of Defendant, including any baptism, confirmation or altar service records.
7. All journals, diaries, notes, letter, e-mails or other documents written by you which refer to your alleged childhood sexual assault in your complaint or any injuries you are claiming in this action.
8. All documents related to any healthcare evaluation, diagnosis or treatment you have received for any injury you are claiming in this action.
9. All documents relating to any childhood sexual assault you suffered by someone other than the perpetrator of Defendant.

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10. All documents related to any mental healthcare evaluation, diagnosis or treatment during your lifetime.
11. All documents related to your education and academic performance from grade school through the present.
12. If you contend that you have lost or will lose earnings or earning capacity, all of your employment records, including employment applications, performance evaluations, paychecks and pay stubs, after high school.
13. All documents relating to any damages you are claiming in this action.

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# EXHIBIT "7"

**SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF ALAMEDA**

COORDINATION PROCEEDING SPECIAL  
TITLE (Rule 3.550)

**NORTHERN CALIFORNIA CLERGY  
CASES**

JCCP NO. 5108

THIS DOCUMENT RELATES TO:

*All Included Actions And Related Cases*

**DEFENDANT'S FACT SHEET**

**Instructions:** Please answer the following questions to the best of your ability.

The term "document," as used in this Defendant Fact Sheet form, means any writing or record of every type that is in your possession or has ever been in your possession (even if, for example, you later provide it, or a copy of it, to your lawyer or someone else from whom you can retrieve it), including any printed, typewritten, handwritten, computer created, or machine generate documentation or manner of reproduction, such as handwritten notations, diaries, calendar notations, appointment books, letters, memoranda, e-mails, text messages, cassettes, videotapes, DVDs, photographs, charts, computer discs or tapes, x-rays, drawings, graphs, phonograph records, data processing reports, and forms, data compilations from which information can be obtained or translated through detection devices into reasonable useable forms, diagrams, symbols, telegrams, telexes, telephone records or logs. These are just examples of items that may constitute a "document" within the meaning of the requests in this form.

In responding to these questions, you are required to provide all information available to you. You are to exercise due diligence to secure the information requested, providing all information in your possession or under your control. If you do not have personal knowledge sufficient to fully respond to a question, you are required to make a reasonable and good faith effort to obtain the information by inquiry to other natural persons or organizations, including family members.

You may attach as many sheets of paper as necessary to fully answer the questions below.

The information you provide in response to this Defendant Fact Sheet constitutes your response, under oath, to discovery in this case, subject to California Code of Civil Procedure Sections 2030-2031 et seq., based on your current personal knowledge. Pursuant to California Code of Civil Procedure Section 2030.230, you may elect, in these responses, to specify the document or documents from which information responsive to the request may be derived or ascertained if

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responding with the requested information would require to summarize the information from the document or documents.

**The answers you provide to this Defendant Fact Sheet are under oath, and you certify them to be true and correct to the best of your knowledge as of the time of completion.**

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NAME OF DEFENDANT: \_\_\_\_\_

ATTORNEY: \_\_\_\_\_

NAME OF PERPETRATOR(S) \_\_\_\_\_

1. PERPETRATOR CLERICAL HISTORY:

- A. Seminary and/or Other Training: \_\_\_\_\_
- B. Year and Diocese/Order of Ordination: \_\_\_\_\_
- C. Places and Dates of Clerical Assignments: \_\_\_\_\_
- D. Current Assignment/Residence of Perpetrator: \_\_\_\_\_
- E. Was Cleric Laicized? If so, date: \_\_\_\_\_
- F. Is the Perpetrator deceased? YES \_\_\_\_\_ NO \_\_\_\_\_? If so, what is the date of death? \_\_\_\_\_

2. PERPETRATOR'S HISTORY OF SEXUAL ASSAULTS:

- A. First Date of Report to Defendant, oral or written, of childhood sexual assaults or suspicions of child sexual assault: \_\_\_\_\_
- B. Total number of reports received by Defendant as of present: \_\_\_\_\_
- C. Names and Positions of Authority of all of Defendant's employees or agents receiving reports, and dates of receipt: \_\_\_\_\_

3. LAW ENFORCEMENT CONTACTS:

- A. Was Perpetrator reported by Defendant to any law enforcement agency?
- B. YES \_\_\_\_\_ NO \_\_\_\_\_
- C. If so, identify each law enforcement agency to which Defendant made a report of childhood sexual assault by Perpetrator, and the approximate date: \_\_\_\_\_
- D. Identify all persons, including Defendant's employees or volunteers, who had contact with any Law Enforcement Agency concerning Perpetrator: \_\_\_\_\_
- E. Was Perpetrator criminally charged with any crime of childhood sexual assault? \_\_\_\_\_

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F. If so, Please identify the court and dates of such criminal charges:

\_\_\_\_\_

\_\_\_\_\_

4. RECORDS OF PERPETRATOR:

A. Does Defendant have any documentary or electronic records of Perpetrator?

B. Who is the current custodian of all such records:

\_\_\_\_\_

5. CLAIMS HISTORY:

A. Has Defendant received any claims for damages or compensation for conduct of Perpetrator, other than this claim? \_\_\_\_\_

B. If so, Please state the number of such individual claims: \_\_\_\_\_

C. Please identify the status of such claims, including withdrawn, pending, dismissed, or resolved by settlement or judgment: \_\_\_\_\_

\_\_\_\_\_

D. Has Defendant publicly identified Perpetrator as credibly accused of childhood sexual assault? If so, when and in what forums:

\_\_\_\_\_

E. If Defendant has received notice of any civil actions claiming damages arising from childhood sexual assault by Perpetrator, please identify each such action by Court, venue, action number, and date of filing.

6. CONTACTS WITH PLAINTIFF OR OTHERS:

A. Has Defendant obtained or received any contact or communications from Plaintiff about the childhood sexual assault, including correspondence, interviews, records, emails, or verbal or phone conversations? \_\_\_\_\_

B. If so, please describe the nature, date, and persons involved in each such communication: \_\_\_\_\_

C. Has Plaintiff been provided with any payments for counseling or other services of any kind by Defendant? If so, please describe the amount, dates, and services for which payments were made.

\_\_\_\_\_

\_\_\_\_\_

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7. INSURANCE INFORMATION:

At the time of the alleged childhood sexual assault by the perpetrator, was there in effect any policy of insurance through which you were or might be insured in any manner (for example, primary, pro-rata, or excess liability coverage or medical expense coverage) for the damages, claims, or actions that have arisen out of the alleged childhood sexual assault? If so, for each policy state:

- A. The kind of coverage;
- B. The name and address of the insurance company;
- C. The name, address, and telephone number of each named insured;
- D. The policy number;
- E. The limits of coverage for each type of coverage contained in the policy;
- F. Whether any reservation of rights or controversy or coverage dispute exists between you and the insurance company; and
- G. The name, address and telephone number of the custodian of the policy.

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# EXHIBIT "8"

**SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF ALAMEDA**

COORDINATION PROCEEDING SPECIAL  
TITLE (Rule 3.550)

**NORTHERN CALIFORNIA CLERGY  
CASES**

JCCP NO. 5108

THIS DOCUMENT RELATES TO:

*All Included Actions And Related Cases*

**INITIAL DOCUMENT DEMAND SHEET TO INSTITUTIONAL DEFENDANTS**

The term "document," as used in this Document Demand Sheet, means any writing or record of every type that is in your possession or has ever been in your possession (even if, for example, you later provide it, or a copy of it, to your lawyer or someone else from whom you can retrieve it), including any printed, typewritten, handwritten, computer created, or machine generate documentation or manner of reproduction, such as handwritten notations, diaries, calendar notations, appointment books, letters, memoranda, e-mails, text messages, cassettes, videotapes, DVDs, photographs, charts, computer discs or tapes, x-rays, drawings, graphs, phonograph records, data processing reports, and forms, data compilations from which information can be obtained or translated through detection devices into reasonable useable forms, diagrams, symbols, telegrams, telexes, telephone records or logs. These are just examples of items that may constitute a "document" within the meaning of the requests in this form.

The terms "complaint" when used herein, refers to Plaintiff's written Complaint in this action, as most recently amended at the time of your response to these questions, including Plaintiff's Notice of Adoption of the Master Complaint.

The term "perpetrator," when used herein, refers to the person or persons alleged in Plaintiff's complaint or Notice of Adoption to have sexually assaulted Plaintiff, and whose alleged conduct forms the basis for liability in this action.

In responding to these questions, you are required to provide all information available to you. You are to exercise due diligence to secure the information requested, providing all information in your possession or under your control. Information under your control includes any and all "documents" in your possession or in the possession of your agents, employees, insurance carriers, and attorneys. If you do not have personal knowledge sufficient to fully respond to a question, you are required to make a reasonable and good faith effort to obtain the information by inquiry to other natural persons or organizations.

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The information you provide in response to this Document Demand Sheet is being provided pursuant to of California Code of Civil Procedure sections 2031.010, et seq., and constitutes your response, under oath, to discovery in this case, based on your current personal knowledge, and you certify them to be and correct to the best of your knowledge as of the time of completion.

As to any "document" withheld on claims of privacy, privilege, or other statutory grounds, you must provide a Privilege Log of any such documents containing sufficient information to allow counsel and the Court to identify the document, its custodian, the date, the author or creating party, and the privilege or other objections to its production.

Please produce all documents in your custody, possession or control that are responsive to the following requests, together with a sworn statement of compliance pursuant to California Code of Civil Procedure sections 2031.210, et seq., that the documents produced are true copies of the originals or that, as to the documents not produced, a representation of an inability to comply.

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**DEFENDANT'S INITIAL EXCHANGE OF CASE SPECIFIC DOCUMENTS**

**Producing Defendant:**

**Perpetrator:**

**Plaintiff True Name:**

**Parish(es)**

All objections to each of these requests, and as to the documents to be produced, are preserved.

1. Any and all personnel files and employment records, including psychiatric, therapist, or other professional evaluations, regardless of administrative purpose for which such files or records are or were prepared or maintained; together with a Privilege Log as to any documents withheld from production;
2. Any and all correspondence, records of communications, emails or electronic communications, or notes from parishioners or church members regarding claims of childhood sexual abuse by perpetrator, activities or relationships with minors, conduct or misconduct that creates a risk of childhood sexual assault, together with a Privilege Log as to any documents withheld from production;
3. Any and all reports of sexual misconduct with minors by Perpetrator, including law enforcement reports or communications, internal discipline or investigations, written or verbal reports, or notes or recordings of information provided by any individual, media accounts or reports;
4. Any and all statements, emails, or notes of verbal conversations or communications between Plaintiff and any other persons regarding claims of abuse,
5. Records of Perpetrator's assignments during Priesthood;
6. All documents evidencing claims made by persons other than Plaintiff that Perpetrator committed any form of sexual assault upon them when they were a minor. Said documents include but are not limited to Complaints filed with any court; electronic or written communications between employees of Defendant and third persons, addressing the subject matter of childhood sexual assaults by Perpetrator; and records of settlements or other financial resolution of such claims;

- 7. Directories or yearbooks of the parish where Plaintiff allegedly was abused for those years Plaintiff has alleged abuse in his/her Complaint; and**
- 8. Photographs or video of the subject Priest.**

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**PROOF OF SERVICE**

**STATE OF CALIFORNIA, COUNTY OF ORANGE**

I am employed in the county of Orange, State of California. I am over the age of 18 and not a party to the within action; my business address is 19100 Von Karman Ave., Suite 800, Irvine, CA 92612.

On August 9, 2021, I served the foregoing document described as **STIPULATION AND [PROPOSED] ORDER RE: PRELIMINARY DISCOVERY PROCEDURES (FACT SHEETS, AUTHORIZATIONS, AND PRODUCTION OF DOCUMENTS)** on the interested parties in this action.

**[X] BY ELECTRONIC SERVICE:** Pursuant to the Court's Electronic Case Management Order, I institute service of the foregoing document by submitting an electronic version of the document via file transfer protocol (FTP) to Case Anywhere through the upload feature at [www.caseanywhere.com](http://www.caseanywhere.com). Service will be deemed effective as provided for in the Electronic Case Management Order.

**[X] (State)** I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

**[ ] (Federal)** I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Executed August 9, 2021, Irvine, California.

*Kathleen Frederiksen*  
Kathy Frederiksen

Superior Court of California, County of Alameda  
Department 21, Administration Building

Case Number: JCCP005108  
Case Name: Northern California Clergy Cases

RE: ORDER RE: PRELIMINARY DISCOVERY PROCEDURES (FACT SHEETS,  
AUTHORIZATIONS, AND PRODUCTION OF DOCUMENTS)

**DECLARATION OF ELECTRONIC SERVICE**

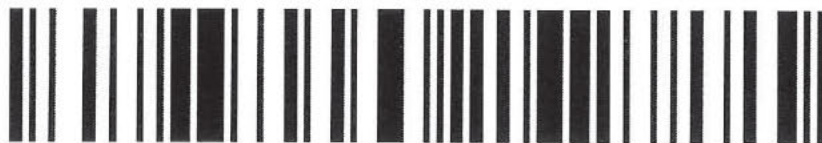
I certify that I am not a party to these cases and that a true and correct copy of the foregoing document was served electronically pursuant to "Order Authorizing Electronic Service", entered in these coordinated proceedings on January 25, 2021, via the CASE ANYWHERE system. Execution of this certificate occurred at 1221 Oak Street, Oakland, California.

Executed on August 10, 2021

Executive Officer/Clerk of the Superior Court

By Christopher Wright  
Deputy Clerk

# EXHIBIT H



\*35376200\*

DOCUMENT: Order on Criteria for Bellwether Cases (ORD010)

CASE: JCCP005108

--

FILED: 11/18/2022

FILED BY:

BARCODE BY: cwright 11/18/2022 4:11 PM

ENTERED BY: cwright 11/18/2022 4:11 PM

FILED  
ALAMEDA COUNTY

NOV 18 2022

CLERK OF THE SUPERIOR COURT

By ang D Deputy

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF ALAMEDA

IN RE NORTHERN CALIFORNIA CLERGY  
CASES

No. JCCP 5108

ORDER ON CRITERIA FOR  
BELLWETHER CASES.

THIS FILING RELATES TO:

DATE 11/16/22

TIME 1:30 PM

DOE OK 1014 v. DOE, Alameda County Case

DEPT 21

#HG20053992.

The court held a CMC on 11/16/22 at which the court and the parties discussed the selection of additional bellwether cases for trials after the trials of the initial six bellwether trials. At the CMC, counsel for plaintiffs and for defendants identified a variety of factors that the court might want to consider in selecting cases for the additional bellwether cases. The court is inclined to select cases for bellwether trials based on whether they will present legal or factual issues that are present in many of cases or that will otherwise provide information that will permit the parties to evaluate the value of other cases.



1 At the CMC, the court ORDERED:

2  
3 The parties are to meet and confer regarding the establishment of criteria for the  
4 trial of the second six bellwether cases. Parties are to report to the court at the  
5 November 30, 2022, continued CMC. CMC statements to be filed on Monday,  
6 November 28 instead of Wednesday, November 23.

7  
8 Defense counsel are to prepare a spreadsheet showing the number of claims filed  
9 against each institutional defendant, to be filed on November 30, 2022, with the  
10 report on the criteria developed by the parties for selecting bellwether cases.

11  
12 The court now provides additional direction on the selection of criteria for cases that the  
13 parties propose for additional bellwether trials. For each case, the court anticipates ordering  
14 counsel to provide at least the following information:

- 15 1. Case name and number.  
16  
17 2. Diocese / County of alleged assault(s).  
18  
19 3. Whether prior notice to institutional defendant will an issue.  
20  
21 4. Whether there are multiple claims regarding the alleged perpetrator.  
22  
23 5. Preexisting situation of plaintiff (preexisting cognitive situation, intact family, etc.).  
24  
25 6. Severity and duration of alleged assaults (exposure, oral copulation, sodomy, etc.  
26 Single or multiple incidents).  
7. Severity of alleged emotional injury.  
8. Severity of alleged economic loss (therapy bills, inability to hold a job, etc.).

1 ///

2 Counsel may identify additional that counsel think would be relevant to the selection of the  
3 second set of bellwether trials.  
4

5 Dated: November \_\_, 2022

6 NOV 18 2022



Evelio Grillo  
Judge of the Superior Court

Superior Court of California, County of Alameda  
Department 21, Administration Building

Case Number: JCCP005108  
Case Name: Northern California Clergy Cases

RE: ORDER ON CRITERIA FOR BELLWETHER CASES

**DECLARATION OF ELECTRONIC SERVICE**

I certify that I am not a party to these cases and that a true and correct copy of the foregoing document was served electronically pursuant to "Order Authorizing Electronic Service", entered in these coordinated proceedings on January 25, 2021, via the CASE ANYWHERE system. Execution of this certificate occurred at 1221 Oak Street, Oakland, California.

Executed on November 18, 2022

Executive Officer/Clerk of the Superior Court

By Christopher Wright  
Deputy Clerk

# EXHIBIT I

FILED  
ALAMEDA COUNTY

NOV 30 2022

CLERK OF THE SUPERIOR COURT

By *WJL* Deputy

**SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF ALAMEDA**

IN RE NORTHERN CALIFORNIA CLERGY  
CASES

Alameda County Lead Case No: HG20053992

JCCP NO. 5108

Judge: Honorable Evelio Grillo  
Coordination Trial Judge

Dept: 21

**~~PROPOSED~~ ORDER LIFTING STAY OF  
DISCOVERY AS TO CERTAIN  
BELLWETHER TRIAL CASES**

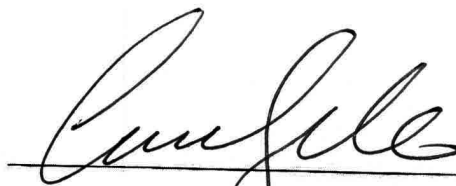
Good cause appearing, the stay of discovery previously entered in those JCCP 5108 is now lifted  
as to the following cases:

1. Case No. Alameda RG21096306; Kimberly Crow v. Roman Catholic Bishop of  
Sacramento, A Corporation Sole
2. Case No. Alameda RG21105722; Barrows v. Roman Catholic Bishop of Fresno;
3. Case Nos. Alameda 20CV005367 / SF CGC20584162, John SF-1 Doe v. Roman  
Catholic Archbishop of San Francisco;
4. Catholic Archbishop of San Francisco, and Alameda 20CV005226 / SF CGC20583648;  
John Doe SF 1013 v. The Roman Catholic Archbishop of San Francisco, A Corporation  
Sole;

1  
2 5. Case No. Alameda RG21086044; John Doe SR 1028 v. Bishop of Santa Rosa.  
3

4 IT IS SO ORDERED  
5

6 Dated: November 30, 2022  
7



8 The Hon. Evelio Grillo  
9 Coordination Trial Judge JCCP 5108  
10

11 APPROVED AS TO FORM:

12 PLAINTIFFS' CO-LIAISON COUNSEL:

13 DATED: November 30, 2022  
14

MANLY, STEWART, AND FINALDI

15 By: /s/ Alex Cunny

Alex Cunny

16 Plaintiffs' Co-Liaison Counsel

17 DATED: November 30, 2022  
18

FURTADO, JASPOVICE & SIMONS

19 By: /s/ Rick Simons SBN 72676

Rick Simons

20 Plaintiffs' Co-Liaison Counsel

21 INSTITUTIONAL DEFENDANTS' LIAISON COUNSEL:

22 DATED: November 30, 2022  
23

WEINTRAUB TOBIN

24 By: /s/ Daniel Zamora

Daniel Zamora, Esq.

25 Institutional Defendants' Liaison Counsel

26 DATED: November 30, 2022  
27

By: /s/ Paul Gaspari

Paul Gaspari

28 Institutional Defendants' Liaison Counsel



Superior Court of California, County of Alameda  
Department 21, Administration Building

Case Number: JCCP005108

Case Name: Northern California Clergy Cases

RE: ORDER LIFTING STAY OF DISCOVERY AS TO CERTAIN BELLWETHER  
TRIAL CASES

**DECLARATION OF ELECTRONIC SERVICE**

I certify that I am not a party to these cases and that a true and correct copy of the foregoing document was served electronically pursuant to "Order Authorizing Electronic Service", entered in these coordinated proceedings on January 25, 2021, via the CASE ANYWHERE system. Execution of this certificate occurred at 1221 Oak Street, Oakland, California.

Executed on November 30, 2022

Executive Officer/Clerk of the Superior Court

By Christopher Wright  
Deputy Clerk

# EXHIBIT J





\*35409247\*

DOCUMENT: Amended Case Management Conference Order (ORD010)

CASE: JCCP005108

--

FILED: 12/05/2022

FILED BY:

BARCODE BY: cwright 12/05/2022 3:21 PM

ENTERED BY: cwright 12/05/2022 3:21 PM

DEC 05 2022

CLERK OF THE SUPERIOR COURT

By  Deputy

SUPERIOR COURT OF THE STATE OF CALIFORNIA  
IN AND FOR THE COUNTY OF ALAMEDA

IN RE NORTHERN CALIFORNIA CLERGY  
CASES

No. JCCP 5108

AMENDED CASE MANAGEMENT  
CONFERENCE ORDER<sup>1</sup>

DATE 11/30/22

TIME 10:00

DEPT 21

The Court, having on 11/30/22 conducted a Case Management Conference (“CMC”) in the above proceedings, and having reviewed the parties’ Joint Case Management Conference Statement, reviewed submitted documents, and heard from counsel, finds and orders as follows:

PENDING MOTIONS BEFORE THE COURT.

There are no pending motions. There are no orders.

DISCUSSIONS BETWEEN LIAISON COUNSEL ON ADR AND RESOLUTION.

There are no orders.

<sup>1</sup> Amended regarding timing of selecting second set of cases for trial.

1           SETTING BELLWETHER CASES FOR TRIAL.

2           The first cases to go to trial will be:

3           Case 1 (JD OK 1022 v. The Roman Catholic Bishop of Oakland, HG19048685; Matrix #  
4 21). Trial will be in Alameda County. Summary judgment motion will be heard no later than  
5 Wednesday 3/29/23. Case has a trial date of April 17, 2023, in Department 21. (See Order filed  
6 9/9/22.)

7           Case 2. Kimberly Crow v. Doe 1, et al., (The Roman Catholic Bishop of Sacramento)  
8 Alameda Superior Court Case No. RG21096306; JCCP 5108 – Matrix #105; Venue: Sacramento  
9 Superior Court.  
10

11          Case 3. Burrows v. Doe 1 (RCB Fresno) Alameda Superior Court Case No.  
12 RG21105722; JCCP 5108 – Matrix #106; Venue: Fresno Superior Court.

13          Case 4A. John SF-1 v Doe 1 (The Roman Catholic Archbishop of San Francisco) San  
14 Francisco Superior Court Case No. CGC 20-584162; Matrix Case #1. Venue: San Francisco.  
15 The Coordination Trial Judge has issued no order on whether the case should be tried separately  
16 or consolidated for trial. (CCP 1048.)  
17

18          Case 4B. John Doe SF 1013 v RCASF, San Francisco Superior Court Case No. CGC 20-  
19 583648; Matrix Case # 26). Venue: San Francisco. The Coordination Trial Judge has issued no  
20 order on whether the case should be tried separately or consolidated for trial. (CCP 1048.)

21          Case 5. TBD re Salesian Society. Mediation set for March 2023. Venue TBD.

22          Case 6. John Doe SR 1028 v. Doe (Bishop of Santa Rosa), Alameda Superior Court Case  
23 No. RG 21 086044 (Matrix # 0081). Venue: Sonoma County. The Diocese of Santa Rosa  
24 informed the Court that the Bishop of Santa Rosa, a corporation sole, will be filing for  
25 bankruptcy protection no later than 3/1/23.  
26

1 The court ORDERS that any motions for summary judgment in Cases 2, 3, 4A, 4B, and 6  
2 will be heard on Thursday 6/8/23. The court ORDERS that the reply briefs must be filed on or  
3 before Friday 5/26/23. The court encourages the parties to agree on a compressed briefing  
4 schedule. In the absence of agreement, the statutory schedule will apply but will be based on the  
5 reply brief due on Friday 5/26/23.

6 The court anticipates issuing orders that remand in Cases 2, 3, 4A, 4B, and 6 to the trial  
7 venues effective Friday 6/15/23. The court expects that as of 6/15/23 the Coordination Trial  
8 Judge will have issued orders on the motions for summary judgment and that each of the trial  
9 cases will be trial ready. If the Coordination Trial Judge has not issued orders on the motions for  
10 summary judgment, the cases will still be remanded to the venue county for trial effective  
11 6/15/22 with the Coordination Trial Judge retaining jurisdiction only over the motions for  
12 summary judgment.

13 The coordination trial judge will not manage a case after it is assigned to a county for  
14 trial. The county to which the case is assigned for trial will manage the case and set the pre-trial  
15 and trial dates. (*Rutherford v. Owens-Illinois* (1997) 16 Cal.4<sup>th</sup> 953, 967 [“courts have  
16 fundamental inherent equity, supervisory, and administrative powers, as well as inherent power  
17 to control litigation before them”]; *Walker v. Superior Court* (1991) 53 Cal.3d 257, 267 [“courts  
18 have inherent authority to control their own calendars and dockets”].)

## 21 CRITERIA FOR AND SELECTION OF FURTHER BELLWETHER TRIALS

22 The court approves the criteria in the CMC Statement for further bellwether trials. The  
23 criteria are:

24 1. Case name and number;

- 1 2. the geographic location of the alleged assault, including the county of the alleged assault, and
- 2 the accused perpetrator's associated parish, school or local institution;
- 3 3. the basis of alleged notice to the Institutional Defendant and whether prior notice will be an
- 4 issue.
- 5 4. the number of claims and alleged victims of the accused perpetrator;
- 6 5. the severity and type of alleged abuse;
- 7 6. the frequency and duration of alleged abuse;
- 8 7. the severity and nature of alleged emotional injury on plaintiff;
- 9 8. the severity of alleged economic loss (therapy bills, inability to hold a job, etc.);
- 10 9. the plaintiff's age at the time of alleged abuse;
- 11 10. the time period of the alleged abuse;
- 12 11. the particular institutional defendant(s) involved and whether any trials have previously been
- 13 set against them. If so, how does that prior trial compare in criteria to the proposed new trial; and
- 14 12. whether the perpetrator was already the subject of discovery during *Clergy III*.
- 15
- 16
- 17

18 At the Case Management Conference on November 16, 2022, the Court and Liaison  
19 Counsel agreed that the selection of the next six bellwether cases would not begin until sometime  
20 after the close of the December 31, 2022 "revival" window in order to permit the selection of  
21 more representative bellwether cases based on the complete universe of JCCP 5108 cases.

22 The court ORDERS that before the CMC in February 2023 Liaison Counsel are to submit  
23 a list of any agreed bellwether trials, up to a total of six, at least five court days before the next  
24 CMC. If the sides cannot agree, then each side may submit a list of up to six proposed  
25 bellwether trials that for each case states where it is ranked in that side's preference, a short  
26



1 summary argument (e.g. 60 words) about why it is an appropriate bellwether case, and the  
2 information in the criteria list. The court can then pick the next six trials.

#### 3 4 STATUS OF ADDING ON CASES AND CERTIFICATE REVIEWS

5 The court updated the parties on the efforts being made by the court to process the  
6 Certificates of Merit, Certificates of Corroborative Fact, Stipulations to add cases to the JCCP,  
7 and the related orders.

8  
9 The cases are not the JCCP until they are in the JCCP, and even after they are in the  
10 JCCP, the filings of the Certificates of Merit, Certificates of Corroborative Fact, Stipulations to  
11 add cases to the JCCP, and the related orders are related only to the individual case and not to the  
12 management of the JCCP as a whole. Therefore, the court ORDERS:

- 13 1. Certificates of Merit and the resulting orders will be filed in the underlying cases, but  
14 not in the JCCP. The documents will not be served on Caseanywhere.
- 15 2. Certificates of Corroborative Fact and the resulting orders will be filed in the  
16 underlying cases, but not in the JCCP. The documents will not be served on  
17 Caseanywhere.
- 18 3. Stipulations to add cases to the JCCP and the resulting orders will be filed in the  
19 underlying cases, but not in the JCCP. The documents will not be served on  
20 Caseanywhere.
- 21 4. Counsel in the individual cases are responsible for checking the court's register of  
22 actions to obtain copies of the relevant orders.
- 23 5. Liaison Counsel must starting in January 2023 provide the court with information in  
24 the joint CMC Statement about any Certificates of Merit, Certificates of  
25  
26

1 Corroborative Fact, and Stipulations to add cases to the JCCP that have not been  
2 ruled on or addressed by the court.

- 3 6. Liaison Counsel must continue to maintain a list of the cases that have been added to  
4 the JCCP.  
5

6 MEET AND CONFER EFFORTS ON ISSUES IDENTIFIED BY THE COURT  
7

8 Except as noted in the CMC statement, the sides did not reach agreement on whether  
9 judgments from Clergy III, JCCP 4359, or from bellwether trials in NorCal Clergy, JCCP 5108,  
10 might have issue preclusion effect in subsequent cases.

11 The Court indicated that in the absence of agreement of both sides that the Court thought  
12 that it could not determine whether prior judgments would have issue preclusion effect in  
13 subsequent cases and that the issue of claim preclusion should be decided by the trial judges in  
14 each individual case.  
15

16 Dated: December 5, 2022



Evelio M. Grillo  
Judge of the Superior Court

Superior Court of California, County of Alameda  
Department 21, Administration Building

Case Number: JCCP005108  
Case Name: Northern California Clergy Cases

RE: AMENDED CASE MANAGEMENT CONFERENCE ORDER

**DECLARATION OF ELECTRONIC SERVICE**

I certify that I am not a party to these cases and that a true and correct copy of the foregoing document was served electronically pursuant to "Order Authorizing Electronic Service", entered in these coordinated proceedings on January 25, 2021, via the CASE ANYWHERE system. Execution of this certificate occurred at 1221 Oak Street, Oakland, California.

Executed on December <sup>16</sup> 8, 2022

Executive Officer/Clerk of the Superior Court

By Christopher Wright  
Deputy Clerk



# EXHIBIT K

FILED  
ALAMEDA COUNTY

DEC 1 2 2022

CLERK OF THE SUPERIOR COURT  
By  Deputy

SUPERIOR COURT OF THE STATE OF CALIFORNIA  
IN AND FOR THE COUNTY OF ALAMEDA

IN RE NORTHERN CALIFORNIA CLERGY  
CASES

No. JCCP 5108

ORDER TRANSFERRING JOHN SF-1 V.  
RCASF, SAN FRANCISCO CGC-20-584162,  
TO SAN FRANCISCO FOR TRIAL.

THIS FILING RELATES TO:

John SF-1 v Doe 1 (The Roman Catholic  
Archbishop of San Francisco) San Francisco  
Case No. CGC-20-584162

DATE N/A  
TIME N/A  
DEPT 21

ASSIGNMENT OF JOHN SF-1 V. RCASF, SAN FRANCISCO CGC-20-584162, TO SAN  
FRANCISCO FOR TRIAL.

The Coordination Trial Judge can transfer cases to appropriate counties for trial. (CRC 3.541(b)(1) and 3.543.) The court considers “the convenience of parties, witnesses, and counsel, the relative development of the actions and the work product of counsel, the efficient utilization of judicial facilities and manpower, the calendar of the courts, and any other relevant matter.” (CRC 3.341(b)(2); *Pesses v. Superior Court* (1980) 107 Cal.App.3d 11.7, 123.) Of the factors, the court finds that the most significant factor is the location whether the plaintiff was allegedly

1 subjected to childhood sexual assault. That is the location of the injury, the location of the  
2 defendant entity, and the likely location of the trial witnesses.

3 The Court finds that Plaintiff John SF-1 was allegedly subjected to childhood sexual  
4 assault in San Francisco County.

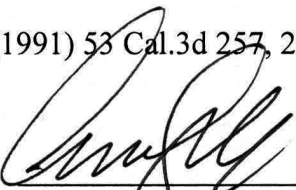
5  
6 The court ORDERS:

- 7 1. The case of *John SF-1 v Doe 1* (The Roman Catholic Archbishop of San Francisco)  
8 San Francisco Superior Court Case No. CGC 20-584162, shall be transferred to the  
9 Superior Court of the State of California, San Francisco County for trial. The  
10 Coordination Trial Judge has issued no order on whether the case should be tried  
11 separately or consolidated for trial. (CCP 1048.)  
12
- 13 2. The transfer is effective 6/15/23. After that date, the transferee court may exercise  
14 jurisdiction over the action in accordance with the orders and directions of the  
15 coordination trial judge, and no other court may exercise jurisdiction over that action  
16 except as provided in CRC 3.543.  
17
- 18 3. The Coordination Trial Judge has been advised that the trial will be set in a  
19 department to be determined by the presiding judge, currently the Honorable Samuel  
20 K. Feng.
- 21 4. Any party who objects to this order may file a motion for reconsideration within 10  
22 days of this order. (CRC 3.543.(b).) If no party files a motion for reconsideration,  
23 then this order remains in effect.  
24
- 25 5. After the time to file a motion for reconsideration has passed, counsel for plaintiff  
26 must file a copy of this order in the identified court and take any additional steps

1 necessary to ensure that a case file is opened in the transferee court so that  
2 management of the case can be transferred at the appropriate time.

- 3  
4 6. As of the effective date of the transfer, the case shall be “trial ready” similar to a case  
5 that is transferred from a master calendar judge to a trial judge. Pleading motions,  
6 discovery motions, and motions for summary judgment will be conducted in the  
7 Coordinated Proceeding. All such motions will be heard by the Coordination Trial  
8 Judge before the effective date of the transfer. (*Hernandez v. Superior Court* (2003)  
9 112 Cal. App. 4th 285, 295 [“The trial court has broad discretion to fashion suitable  
10 methods of practice in order to manage complex litigation”]; *Volkswagen of America,*  
11 *Inc. v. Superior Court* (2001) 94 Cal.App.4th 695, 704-705 [“by recognizing the need  
12 for "exceptional judicial management" the Judicial Council necessarily acknowledged  
13 that [complex] courts have the authority to take whatever exceptional management  
14 actions are necessary to accomplish that result”].) If the Coordination Trial Judge  
15 has motions under submission as of the date of the transfer, then the Coordination  
16 Trial Judge will retain authority and responsibility to issue orders on those motions.  
17  
18 7. The Coordination Trial Judge will not set a pre-trial schedule for the case in the  
19 transferee court. After a case is transferred to the transferee court for trial then the  
20 transferee court will manage the case and can adjust the trial schedule to consider  
21 courtroom availability and other factors. (*Rutherford v. Owens-Illinois, Inc.* (1997)  
22 16 Cal.4th 953, 967; *Walker v. Superior Court* (1991) 53 Cal.3d 257, 267.)  
23

24 Dated: December 12, 2022

25   
26 Evelio Grillo  
Judge of the Superior Court

Superior Court of California, County of Alameda  
Department 21, Administration Building

Case Number: JCCP005108

Case Name: Northern California Clergy Cases

RE: ORDER TRANSFERRING JOHN SF-1 V. RCASF, SAN FRANCISCO CGC-20-584162, TO SAN FRANCISCO FOR TRIAL

**DECLARATION OF ELECTRONIC SERVICE**

I certify that I am not a party to these cases and that a true and correct copy of the foregoing document was served electronically pursuant to "Order Authorizing Electronic Service", entered in these coordinated proceedings on January 25, 2021, via the CASE ANYWHERE system. Execution of this certificate occurred at 1221 Oak Street, Oakland, California.

Executed on December 12, 2022

Executive Officer/Clerk of the Superior Court

By Jhalisa Castaneda  
Deputy Clerk

# EXHIBIT L



1 JOHN C. MANLY, Esq. (State Bar No. 149080)  
2 VINCE W. FINALDI (State Bar No. 238279)  
3 ALEX CUNNY (State Bar No. 291567)  
4 **MANLY, STEWART & FINALDI**  
5 19100 Von Karman Ave., Suite 800  
Irvine, CA 92612  
Telephone: (949) 252-9990  
Fax: (949) 252-9991  
Plaintiffs' Co-Liaison Counsel

6 RICHARD SIMONS, State Bar No. 72676  
7 **FURTADO, JASPOVICE & SIMONS**  
8 6589 Bellhurst Lane  
9 Castro Valley, California 84552  
Telephone: 510-917-2169  
Plaintiffs' Co-Liaison Counsel

**FILED**  
**ALAMEDA COUNTY**

MAR 23 2023

CLERK OF THE SUPERIOR COURT  
By Nicole Haddad

10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
11 **IN AND FOR THE COUNTY OF ALAMEDA**

12 **COORDINATION PROCEEDING SPECIAL**  
13 **TITLE (Rule 3.550):**

14 **NORTHERN CALIFORNIA CLERGY**  
15 **CASES**

16 This document relates to:

17 *John SF-1 Doe, v. Doe 1, et al.*  
18 (San Francisco County Case No.  
CGC-20-20-584162/ Alameda  
County Case No. 20CV05367)

19 *John Doe SF1013 v. Doe Archdiocese,*  
20 *et al.*  
21 (San Francisco County Case No.  
CGC-20-583648)

JCCP NO. 5108  
Judge: Honorable Evelio Grillo  
Coordination Trial Judge  
Dept: 21

~~STIPULATION AND PROPOSED~~  
**ORDER REGARDING PRE-TRIAL DATES  
AND DEADLINES FOR SAN FRANCISCO  
COUNTY BELLWETHER TRIAL(S)**

**TO THE COURT, ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

**PLEASE TAKE NOTICE** that it is HEREBY STIPULATED between Plaintiff John SF-1 Doe, Plaintiff John Doe SF1013 (collectively "Plaintiffs") and Defendant DOE ARCHDIOCESE, by and through their counsel of record, to the following proposed deadlines and notice periods relating to the Bellwether Trials designated 4A and 4B (remanded to San Francisco effective June 15, 2023), conditioned upon approval by the Court of these proposed deadlines:

1. Motion(s) for Summary Judgment/Adjudication ("MSJ/A"): In stipulating to different timelines than those forth in C.C.P. §437c, the Parties stipulate to the following deadlines for filing, opposition, and reply deadlines, as well as the hearing date for the MSJ/A:
  - i. The Notice of Motion(s) and Motion(s) of any party shall be filed and served no later than **March 31, 2023**;
  - ii. The Opposition(s) to the MSJ/A(s) shall be filed and served no later than **May 25, 2023**;
  - iii. The Reply Brief to the MSJ/A shall be filed and served no later than **June 1, 2023**;
  - iv. The hearing date on the MSJ/A(s) will occur on **June 8, 2023** in Department 21.
2. Percipient Witness Discovery Cut-Off: The percipient witness discovery cut-off is set for **June 1, 2023**;
3. Percipient Discovery Motion Cut-Off: Any and all percipient, non-expert discovery motions shall be filed and heard on the following timeline:
  - i. The Notice of Motion(s) and Motion(s) of either party shall be filed and served no later than **May 29, 2023**;
  - ii. The Opposition(s) to these final discovery motions shall be filed and served no later than **June 2, 2023**;
  - iii. The Reply Brief to these final discovery motions shall be filed and served no later than **June 5, 2023**;



iv. The hearing date on these final discovery motions will occur on **June 8, 2023** in Department 21.

4. Expert Exchange, Disclosure and Discovery Deadlines:

i. Expert Disclosures: Without the need for any of the Plaintiffs to make a formal demand for exchange of expert witness information pursuant to C.C.P. §2034.220, the Parties agree to the following deadlines for expert disclosures:

1. The first exchange of expert witness information shall occur on **May 5, 2023;**

2. The second exchange of expert witness information shall occur on **May 10, 2023;**

ii. Expert Depositions: Expert witness depositions shall be taken and completed between **May 17, 2023** and **May 29, 2023**. The Parties agree that seven calendar days is sufficient notice of the depositions of any expert and that, if requested, the expert shall produce his/her/their files at least two calendar days before the date scheduled for that expert's deposition testimony.

iii. Expert Motions: All Expert Discovery Motions shall be filed no later than **June 5, 2023**. Hearing and opposition deadlines for any motions filed on this date shall be set by the Hon. Judge Grillo as is available by his department.

Unless otherwise stipulated above, the *Code of Civil Procedure* will govern all other deadlines and notice periods, unless otherwise ordered by the Court.

**IT IS SO STIPULATED.**

Dated: February 7th, 2023

**MANLY, STEWART & FINALDI**

By:

  
ALEX E. CUNNY, Esq.  
Counsel for Plaintiff John SF-1 Doe

1 Dated: February 7, 2023

FURTADO, JASPOVICE & SIMONS

By:

RICK SIMONS, Esq.

Counsel for Plaintiff John Doe SF1013

5 Dated: February 2, 2023

WEINTRAUB TOBIN

By:

ZACHARY SMITH, Esq.

Counsel for DOE ARCHDIOCESE

{3707060.DOCX;}

**[PROPOSED] ORDER**

Having reviewed the above stipulation and finding GOOD CAUSE therefor, the Court hereby Orders:

1. Motion(s) for Summary Judgment/Adjudication ("MSJ/A") The Parties shall comply with the the following deadlines for filing, opposition, and reply deadlines, as well as the hearing date for the MSJ/A:

- i. The Notice of Motion(s) and Motion(s) of any party shall be filed and served no later than **March 31, 2023**;
- ii. The Opposition(s) to the MSJ/A(s) shall be filed and served no later than **May 25, 2023**;
- iii. The Reply Brief to the MSJ/A shall be filed and served no later than **June 1, 2023**;
- iv. The hearing date on the MSJ/A(s) will occur on **June 8, 2023** in Department 21.

2. Percipient Witness Discovery Cut-Off: The percipient witness discovery cut-off is set for **June 1, 2023**;

3. Percipient Discovery Motion Cut-Off: Any and all percipient, non-expert discovery motions shall be filed and heard on the following timeline:

- i. The Notice of Motion(s) and Motion(s) of either party shall be filed and served no later than **May 29, 2023**;
- ii. The Opposition(s) to these final discovery motions shall be filed and served no later than **June 2, 2023**;
- iii. The Reply Brief to these final discovery motions shall be filed and served no later than **June 5, 2023**;
- iv. The hearing date on these final discovery motions will occur on **June 8, 2023** in Department 21.



4. Expert Exchange, Disclosure and Discovery Deadlines:

i. Expert Disclosures: Without the need for any of the Plaintiffs to make a formal demand for exchange of expert witness information pursuant to C.C.P. §2034.220, the Parties agree to the following deadlines for expert disclosures:

1. The first exchange of expert witness information shall occur on **May 5, 2023;**

2. The second exchange of expert witness information shall occur on **May 10, 2023;**

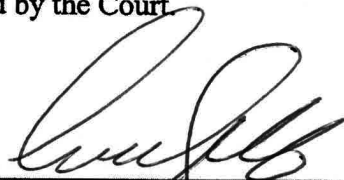
ii. Expert Depositions: Expert witness depositions shall be taken and completed between **May 17, 2023** and **May 29, 2023**. Seven calendar days is sufficient notice of the depositions of any expert and that, if requested, the expert shall produce his/her/their files at least two calendar days before the date scheduled for that expert's deposition testimony.

iii. Expert Motions: All Expert Discovery Motions shall be filed no later than **June 5, 2023**. Hearing and opposition deadlines for any motions filed on this date shall be set by the Hon. Judge Grillo as is available by his department.

Unless otherwise stipulated above, the *Code of Civil Procedure* will govern all other deadlines and notice periods, unless otherwise ordered by the Court

**IT IS SO ORDERED.**

DATE: March 23, 2023

  
The Honorable Judge Evelio Grillo  
Judge of the Superior Court of California  
In and for the County of Alameda

Superior Court of California, County of Alameda  
Department 21, Administration Building

Case Number: JCCP005108

Case Name: Northern California Clergy Cases

ORDER REGARDING PRE-TRIAL DATES AND DEADLINES FOR SAN  
FRANCISCO COUNTY BELLWETHER TRIAL(S)

**DECLARATION OF ELECTRONIC SERVICE**

I certify that I am not a party to these cases and that a true and correct copy of the foregoing document was served electronically pursuant to "Order Authorizing Electronic Service", entered in these coordinated proceedings on January 25, 2021, via the CASE ANYWHERE system. Execution of this certificate occurred at 1221 Oak Street, Oakland, California.

Executed on March 23, 2023

Executive Officer/Clerk of the Superior Court

By Nicole Hall  
Deputy Clerk

# EXHIBIT M

**FILED**  
**ALAMEDA COUNTY**

JUL 19 2023

CLERK OF THE SUPERIOR COURT

By

*Nicole Hall*

SUPERIOR COURT OF THE STATE OF CALIFORNIA  
IN AND FOR THE COUNTY OF ALAMEDA

IN RE NORTHERN CALIFORNIA CLERGY  
CASES

No. JCCP 5108

ORDER TRANSFERRING JOHN SF-1 V.  
RCASF, SAN FRANCISCO CGC-20-584162,  
TO SAN FRANCISCO FOR TRIAL.

THIS FILING RELATES TO:

John SF-1 v Doe 1 (The Roman Catholic  
Archbishop of San Francisco) San Francisco  
Case No. CGC-20-584162


DATE N/A  
TIME N/A  
DEPT 21

On 12/12/22, the Coordination Trial Judge entered an order that the case of *John SF-1 v Doe 1* (The Roman Catholic Archbishop of San Francisco) San Francisco Superior Court Case No. CGC 20-584162, shall be transferred to the Superior Court of the State of California, San Francisco County for trial. The order of 12/12/22 states: "The transfer is effective 6/15/23."

The Coordination Trial Judge now ORDERS that that the case of *John SF-1 v Doe 1* (The Roman Catholic Archbishop of San Francisco) San Francisco Superior Court Case No. CGC 20-584162, is transferred to the Superior Court of the State of California, San Francisco County for trial. The transfer was effective 6/15/23.

1 After a case is transferred to the transferee court for trial then the transferee court will  
2 manage the case and can adjust the trial schedule to consider courtroom availability and other  
3 factors. (*Rutherford v. Owens-Illinois, Inc.* (1997) 16 Cal.4<sup>th</sup> 953, 967; *Walker v. Superior*  
4 *Court* (1991) 53 Cal.3d 257, 267.)

5  
6 Dated: July 19, 2023

7   
8 Evelio Grillo  
9 Judge of the Superior Court

Ro



Superior Court of California, County of Alameda  
Department 21, Administration Building

Case Number: JCCP005108

Case Name: Northern California Clergy Cases

ORDER TRANSFERRING JOHN SF-1 V. RCASF, SAN FRANCISCO, CGC20-584162, TO SAN FRANCISCO FOR TRIAL

**DECLARATION OF ELECTRONIC SERVICE**

I certify that I am not a party to these cases and that a true and correct copy of the foregoing document was served electronically pursuant to "Order Authorizing Electronic Service", entered in these coordinated proceedings on January 25, 2021, via the CASE ANYWHERE system. Execution of this certificate occurred at 1221 Oak Street, Oakland, California.

Executed on July 19, 2023

Executive Officer/Clerk of the Superior Court

By Nicole Hall  
Deputy Clerk

# EXHIBIT N

**FILED**

Superior Court of California  
County of Alameda

01/23/2025

Clad Fluke, Executive Officer / Clerk of the Court

By: Nicole Hall Deputy  
N. Hall

SUPERIOR COURT OF THE STATE OF CALIFORNIA  
IN AND FOR THE COUNTY OF ALAMEDA

IN RE NORTHERN CALIFORNIA CLERGY  
CASES

No. JCCP 5108  
No. HG20-053992

CASE MANAGEMENT CONFERENCE  
ORDER

DATE 1/22/25  
TIME 1:30  
DEPT 21

The Court, having on 1/22/25 conducted a Case Management Conference (“CMC”) in the above proceedings, and having reviewed the parties’ Joint Case Management Conference Statement, reviewed submitted documents, and heard from counsel, finds and orders as follows:

**I. STATUS OF THE JCCP**

The Order of 7/22/00 granted the petition for coordination. This JCCP exists because an amendment to CCP 340.1 permitted otherwise time barred claim to “be commenced within three years of January 1, 2020.” (CCP 340.1(q).) (Order of 4/29/21.) The cases in the JCCP were filed between 1/1/20 and 12/31/22. The Court aspires to resolve complex cases within three years (Std Jud Admin 2.2(g)) and must resolve cases within five years (CCP 583.310).

1 At the CMC on 1/22/25, counsel reported that the JCCP cases fall into three buckets:  
2 Bucket 1—no defendants have filed for bankruptcy protection; Bucket 2—some defendants have  
3 filed for bankruptcy protection; and Bucket 3—all defendants have filed for bankruptcy  
4 protection. After the CMC, the Court received from Plaintiffs' liaison counsel a confidential  
5 spreadsheet listing and briefly describing the pending cases that are in the JCCP. Based on the  
6 spreadsheet: Bucket 1 contains about 268 cases; Bucket 2 contains about 523 cases; and Bucket  
7 3 contains about 814 cases. (These numbers will be adjusted if the Diocese of Fresno or others  
8 file for bankruptcy protection.) To date, no case in the JCCP has undergone trial.  
9

## 10 **II. CASE MANAGEMENT GOING FORWARD.**

11 At the CMC, the Court described initial thoughts regarding a plan for case management  
12 going forward, which is set forth in more detail below. The Court requests that each side,  
13 through liaison counsel, respond to the proposed plan and/or make their own proposals or  
14 modifications to the plan in the joint CMC statement to submitted in advance of the regular  
15 monthly CMC to be held in February 2025.  
16

### 17 *Proposed Management Plan:*

- 18 1. All cases in Buckets 1 and 2 will be given a date for trial (if an Alameda County case) or  
19 a date for transfer to another county for trial. (CRC 3.543.) Counsel shall meet and  
20 confer and propose a schedule of trial/transfer dates. The cases should be grouped, if  
21 appropriate. (For example, cases involving the same alleged individual perpetrator(s)  
22 might be grouped together.) The trial/transfer dates should be staggered in a logical  
23 manner. The schedules in the CMC statement filed 1/21/25 may be a starting point. The  
24 trial/transfer dates should trigger, working backwards, a litigation schedule for case  
25 development, discovery, motions, settlement discussions, and the like for each case in  
26

1 Buckets 1 and 2. The cases must be “trial ready” when they are transferred. (See Orders  
2 of 12/12/22 and 7/18/23 and 5/29/24.) For cases that will be transferred to other counties  
3 for trial, the Coordination Trial judge can determine the transfer date (CRC 3.543) but the  
4 court where the case will be tried will determine the trial department, trial date, and other  
5 specifics about the trial.

- 6 2. The Court is inclined to order mediation within 30 days of the trial/transfer date for cases  
7 that have not previously undergone any type of mediation.
- 8 3. Approximately 30 days before the trial/transfer date, the parties will file exhibit lists,  
9 witness lists, case specific motions in limine, jury instructions, and other filings that  
10 comply with Alameda Local Rule 3.35 or any similar local rule of the county of trial.
- 11 4. Approximately 60 days before the trial/transfer date, the Court will hear motions in  
12 limine that have some general applicability (*i.e.*, a motion that calls for a ruling that has  
13 applicability to a meaningful range of cases), motions for summary adjudication or  
14 summary judgment, and motions to consolidate (CCP 1048).
- 15 5. Effective immediately, the Court will lift any stay of discovery on cases in the JCCP that  
16 have been imposed by Order of this Court. Discovery should be coordinated, so counsel  
17 in related cases participate in the same discovery to avoid duplication. The Court would  
18 consider appointing a discovery coordinator. By definition, the nature of the evidence,  
19 generally, in these cases is dated. With each passing year, witnesses relocate, are more  
20 difficult to find, suffer gradual loss of memory, and might pass away, and documents and  
21 real evidence become more difficult to locate or subject to destruction. The JCCP is  
22 already four-years old. Going forward, the benefits of completing discovery outweigh  
23 the benefits of staggering or further delaying discovery. The cases need to be developed  
24  
25  
26



1 for meaningful resolution—either by settlement or trial—whether in this action or a  
2 related bankruptcy action.

- 3 6. Cases in Bucket 3 will remain stayed in the JCCP as a result of the automatic bankruptcy  
4 stay. Parties are free to pursue their remedies within a bankruptcy action, *e.g.*, by an  
5 adversarial action or otherwise. If a defendant files for bankruptcy protection, cases will  
6 be moved to the appropriate Bucket.  
7  
8 7. Parties are encouraged to pursue mediation and settlement discussions on a parallel track.  
9 Settlement discussions or mediation should not hold up discovery or trial preparation.

### 10 **III. OTHER ISSUES RAISED AT THE CMC**

#### 11 **A. CMCS IN COUNTIES OF ORIGINAL VENUE**

12 Counsel report that some courts in the Counties of Original Venue are setting CMCs. In  
13 a JCCP, the underlying case remains in the county of original venue. If counsel have filed a  
14 notice of stay in the case in the County of Original Venue, then that court should be aware of the  
15 JCCP and the stay of the action. Counsel may submit proposed orders that confirm that a case  
16 has been added to the JCCP under CRC 3.544 or otherwise, that the case is being managed in the  
17 JCCP, that the case might return to the county of original venue for trial, and that the action is  
18 stayed in the home venue. The parties could then file that order in the case pending in the county  
19 of original venue.  
20

#### 21 **B. DISCOVERY DISPUTE RESOLUTION PROCESS**

22 Counsel requested the Court's guidance on Informal Discovery Conferences ("IDC"s).  
23 The Court does not require IDCs before filing a formal discovery motion. The Court finds that  
24 IDCs are helpful when all counsel pertinent to the discovery dispute at issue consent to the IDC.  
25 The Court does not make orders in IDCs over objection. The Court issues orders only on a duly  
26

1 noticed motion. If all counsel pertinent to a discovery dispute agree to an IDC, counsel  
2 proposing the IDC should contact the Dept. 21 clerk and propose dates for a 30-minute session,  
3 and the clerk will calendar the matter for a time when the Court is available. The Court might in  
4 appropriate cases permit counsel who are not directly involved in an IDC to attend and to  
5 passively monitor an IDC to benefit from the discussion.

6  
7 Discovery motions, on the other hand, should be calendared on the date for the monthly  
8 hearings in this JCCP. For discovery motions, parties are free to agree to truncated briefing  
9 requirements and schedules and to waive procedures required by the California Discovery Act.

### 10 **C. MOTIONS TO WITHDRAW AS COUNSEL**

11 The Court ORDERS liaison counsel to develop a proposed order addressing Motions to  
12 Withdraw as Counsel. In a JCCP there are special considerations relating to (1) ensuring that  
13 any person who will be self-represented is informed about all the prior orders in the JCCP and  
14 how to access and use CaseAnywhere and similar information; (2) ensuring that any person who  
15 will be self-represented is informed of their obligations to produce discovery and otherwise  
16 comply with court orders; and (3) clarifying that liaison counsel has limited responsibilities to a  
17 self-represented litigant after the withdrawal of counsel for that person. As a model, the Court  
18 refers the parties to Ranitidine Products, JCCP 5150, order of 9/10/24. The Court also refers  
19 counsel to Essure Products, JCCP 4887, order of 11/2/20, and Ranitidine Products, JCCP 5150,  
20 order of 12/4/23. The Court will provide these to coordinating counsel.

### 22 **D. EX PARTE APPLICATION TO APPOINT SPECIAL PROCESS SERVICE**

23 The case of *John SV Roe Tij v. Doe 1* (Alameda case # 22CV 022675, Matrix # 433),  
24 apparently requires an international service of process of a Doe Defendant under the Hague  
25 Convention. The *ex parte* as filed is DENIED. The current request asks the Court to appoint a  
26

1 process server as the Court's own agent for service of process, which is highly unusual, but  
2 provides no legal basis for doing so. The Court notes that counsel should observe the distinction  
3 between asking the Court for an order that requests the assistance of a foreign jurisdiction's  
4 central authority to effectuate service and asking the Court to appoint a process server as the  
5 Court's own agent. Counsel may file a more robust *ex parte* application stating in greater detail  
6 what is requested and why a court order is appropriate or necessary, including the legal grounds  
7 warranting the specific relief requested.  
8

#### 9 **E. STATUS OF THE FRESNO DIOCESE FUTURE BANKRUPTCY FILING**

10 Plaintiffs seeks an Order to Show Cause or sanctions against the Diocese of Fresno  
11 because Fresno represented that it would be filing for Chapter 11 reorganization and plaintiffs  
12 delayed proceedings regarding Fresno in anticipation of a bankruptcy stay, but Fresno has not yet  
13 filed for bankruptcy. The Court ORDERS that the request for an order to show cause or  
14 sanctions against the Diocese of Fresno is DENIED.  
15

#### 16 **F. EFFECT OF BANKRUPTCY ON CO-DEFENDANTS**

17 Several defendants have filed for bankruptcy and the automatic bankruptcy stay is in  
18 effect for those defendants. The CMC statement filed 1/21/25 at 10:10-15 and 12:22 indicates  
19 that the parties have different views on how a bankruptcy stay applicable to one defendant  
20 affects the prosecution of claims against other defendants. The parties may file appropriate  
21 motions seeking Court Orders on the effect in state court of the automatic bankruptcy stay on any  
22 given defendant or on the proceedings in state court generally. Any Orders by this Court will be  
23 made upon an appropriate motion after adequate briefing regarding a specific dispute.  
24

25 While the Court is disinclined to make advisory rulings, the Court interprets the parties  
26 submission as a request for general guidance. The Court is currently aware of case law that



1 stands for the following propositions: (1) The scope and effect of the stay is decided by the  
2 bankruptcy judges in the first instance (*In re Marriage of Sprague & Spiegel-Sprague* (2003)  
3 105 Cal.App.4th 215, 219; *In re Gruntz* (9<sup>th</sup> Cir., 2000) 202 F.3d 1074, 1082, 1087); (2) a  
4 bankruptcy stay that applies to one defendant in a case applies only to that defendant and does  
5 not necessarily stay an action as to other defendants or to the case as a whole (*Higgins v.*  
6 *Superior Court* (2017) 15 Cal.App.5th 973, 981; *Danko v. O'Reilly* (2014) 232 Cal.App.4th 732,  
7 748; *Cross v. Cooper* (2011) 197 Cal.App.4th 357 fn 2); and (3) a plaintiff asserting claims  
8 against a defendant that is not in bankruptcy may serve and obtain discovery from a defendant  
9 that is in bankruptcy (*In re Miller* (9th Cir. Bankr, 2001) 262 B.R. 499, 503 -507). If the parties  
10 file motions regarding whether a bankruptcy stay prevents or precludes certain actions in state  
11 court, the parties should address the relevant case law, including these decisions.

### 13 G. TRIAL DATES

14 The Court ORDERS that, in the CMC statement for the next regular monthly CMC,  
15 parties may make requests for trial/transfer dates for specific cases.

16  
17 Dated: January 23, 2025

18   
19 S. Raj Chatterjee  
20 Judge of the Superior Court  
21  
22  
23  
24  
25  
26

Superior Court of California, County of Alameda  
Department 21, Administration Building

Case Number: JCCP005108  
Case Name: Northern California Clergy Cases

CASE MANAGEMENT CONFERENCE ORDER

**DECLARATION OF ELECTRONIC SERVICE**

I certify that I am not a party to these cases and that a true and correct copy of the foregoing document was served electronically pursuant to “Order Authorizing Electronic Service”, entered in these coordinated proceedings on January 25, 2021, via the CASE ANYWHERE system. Execution of this certificate occurred at 1221 Oak Street, Oakland, California.

Executed on January 23, 2025

Executive Officer/Clerk of the Superior Court

By : Nicole Hall  
Deputy Clerk

# EXHIBIT O

**SUPERIOR COURT OF CALIFORNIA  
COUNTY OF SAN FRANCISCO**

**MINUTES**

August 11, 2023

JOHN DOE SF 1013

PLAINTIFF

VS.

DOE 1 et al

DEFENDANT

Department: 504

Case Number: CGC-20-583648

Nature of Cause:

CASE MANAGEMENT  
CONFERENCE

Present:

Judge: GARRETT L. WONG

Reporter: KIMBERLY D'URSO CSR#11372  
503-521-2948; [DURSOREPORTING@GMAIL.COM](mailto:DURSOREPORTING@GMAIL.COM)

Clerk: KIMBERLY SEPTIEN

Bailiff: NONE ASSIGNED

Appearing for Plaintiff (s):

**RICHARD JAY SIMONS, ESQ.**

Furtado, Jaspovice & Simons  
6589 Bellhurst Lane  
Castro Valley, CA 94552  
T: 510-582-1080  
E: [rick@fjlaw.com](mailto:rick@fjlaw.com)

*for JOHN DOE SF 1013, PLAINTIFF*

Appearing for Defendant(s):

**ZACHARY SMITH, ESQ.**

**DANIEL ZAMORA, ESQ.**  
Weintraub Tobin Chediak Coleman Grodin  
LAW CORPORATION  
475 Sansome Street, Ste. 510  
San Francisco, CA 94111  
T: 415-433-1400  
E: [zsmith@weintraub.com](mailto:zsmith@weintraub.com)  
[dzamora@weintraub.com](mailto:dzamora@weintraub.com)

*for DOE 1, DEFENDANT*

---

This matter comes on calendar having been singly assigned to Department 504 by the Presiding Judge. The Court, court staff and counsel are present as shown in bold face above via Zoom. The matter is reported by Kimberly D'Urso CSR#11372. This matter is heard concurrently with Case No.: CGC-20-584162.

9:37 AM *On the record*. Court convenes. Counsel state their appearances.  
The Court inquires as to the possible bankruptcy filings by defendants.

Case Number: CGC-20-583648

Case Title: JOHN DOE SF 1013 VS. DOE 1 ET AL

Date: August 11, 2023

Case: 23-30564 Doc# 1019 Filed: 02/21/25 Entered: 02/21/25 12:18:03 Page 120  
of 131

9:40 AM Defendant's counsel, Mr. Zamora states that the bankruptcy filings have been announced and are intended but have not yet been filed. Plaintiff's Counsel for Case No.: CGC-20-584162, Mr. Finaldi states that absent the filings the matter should continue to trial.

9:42 AM The Court states that these cases are a priority and that now having been given the directive, the matters will be brought to trial. The Court discusses the trial scheduling.

9:45 AM Court and counsel discuss various matters. Mr. Finaldi states he is taking the lead in both cases. Defendant's clarify that the cases are not consolidated.

9:50AM After discussion and agreement from all parties of both matters the Court sets Plaintiff's consolidation motion, and motions in limine for August 23<sup>rd</sup> at 9:30am.

9:53 AM The length of the trial and trial specifics are discussed.

10:01 AM Scheduling for oppositions is discussed.

10:05 AM Mr. Smith inquires as to insurance and wealth matters and mentions bifurcation as to punitive. The Court explains the usual protocol for such matters.

The Court sets out the following schedule:

Motions are due: 8/17

Oppositions are due:8/21

There will be no replies.

10:15 AM Jury selections is discussed. Defendant's counsel state ongoing efilng issues. The clerk states the issues will be investigated.

10:41 AM The Court shares the department information and procedures.

10:46 AM Court is adjourned.

# EXHIBIT P

# CGC-20-584162, JOHN SF-1 DOE VS. DOE 1, A CALIFORNIA CORPORATION SOLE ET AL

CA Superior - San Francisco

San Francisco

This case was retrieved on 03/20/2024

## Header

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**Case Number:** CGC-20-584162

**Date Filed:** 04/16/2020

**Date Full Case Retrieved:** 03/20/2024

**Status:** Unknown

**Misc:** (108) PERSONAL INJURY/PROPERTY DAMAGE - NON-VEHICLE RELATED; Civil

## Summary

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**Judge:** ANNE-CHRISTINE MASSULLO; RICHARD B. ULMER; HAROLD E. KAHN; GARRETT L. WONG

## Participants

---

### Litigants

DOE, JOHN SF-1 , AN INDIVIDUAL  
**PLAINTIFF**

DOE 1, A CALIFORNIA CORPORATION SOLE  
**DEFENDANT**

DOES 2-50, INCLUSIVE  
**DEFENDANT**

THE ROMAN CATHOLIC ARCHBISHOP OF SAN  
FRANCISCO A CORPORATION SOLE  
**DEFENDANT**

### Attorneys

MANLY, JOHN C  
PLAINTIFF  
149080  
MANLY, STEWART & FINALDI 19100 VON KARMAN  
AVENUE SUITE 800 IRVINE, CA 92612 949-252-9990

SMITH, ZACHARY M.  
DEFENDANT  
078241  
WENTRAUB TOBIN CHEDIAK COLEMAN GRODIN 475  
SANSOME STREET SUITE 510 SAN FRANCISCO, CA  
94111 415-433-1400 zsmith@weintraub.com

## Calendar

---

Date	Details
09/16/2020	Matter: CASE MANAGEMENT CONFERENCE Off Calendar Aug-28-2020 Continued To Jan-13-21 At 10:30 A.M. In Dept 610 Location: CIVIC CENTER COURTHOUSE ROOM 610 Judge: GARRETT L. WONG
01/13/2021	Matter: CASE MANAGEMENT CONFERENCE Off Calendar Dec-29-2020 Off Calendar Location: CIVIC CENTER COURTHOUSE ROOM 610 Judge: GARRETT L. WONG

CGC-20-584162, JOHN SF-1 DOE VS. DOE 1, A CALIFORNIA CORPORATION SOLE ET AL

Date	Details
08/11/2023	Matter: CASE MANAGEMENT CONFERENCE - TRIAL COURTS Off Calendar Aug-10-2023 Reassignment Of Exempt Case Location: CIVIC CENTER COURTHOUSE ROOM 210 Judge: HAROLD E. KAHN
08/11/2023	Matter: CASE MANAGEMENT CONFERENCE - TRIAL COURTS Off Calendar Aug-14-2023 Off Calendar Location: CIVIC CENTER COURTHOUSE ROOM 504 Judge: GARRETT L. WONG
08/23/2023	Matter: DEFENDANT THE ROMAN CATHOLIC ARCHBISHOP OF SAN FRANCISCO'S Motion To Strike Irrelevant And Improper Matter From Plaintiffs Pleading (C.C.P. 436). Off calendar. Motion not filed and served in compliance with CCP 1005. Judge: Richard B. Ulmer Jr., Clerk: M. Goodman, Not Reported. (302/rbu) Notice And Motion To Strike Irrelevant And Improper Matter From Plaintiffs Pleading (C.C.P. 436) Off Calendar Aug-24-2023 Text Ruling MINI MINUTES: No appearances. The Court adopts the tentative ruling as follows: Location: CIVIC CENTER COURTHOUSE ROOM 302 Judge: RICHARD B. ULMER
08/23/2023	Matter: JURY TRIAL Location: CIVIC CENTER COURTHOUSE ROOM 604 Judge: GARRETT L. WONG
08/23/2023	Matter: JURY TRIAL Off Calendar Aug-14-2023 Continued To Aug-23-23 At 09:30 A.M. In Dept 604 Location: CIVIC CENTER COURTHOUSE ROOM 604 Judge: HAROLD E. KAHN
08/23/2023	Matter: Notice Of Motion And Motion To Bifurcate Trial Pursuant To Civil Code Section 3295 D Location: CIVIC CENTER COURTHOUSE ROOM 504 Judge: GARRETT L. WONG
09/20/2023	Matter: CASE MANAGEMENT CONFERENCE Off Calendar Aug-02-2023 Single Assignment Location: CIVIC CENTER COURTHOUSE ROOM 610 Judge: ANNE-CHRISTINE MASSULLO

## Payments

Date	Amount	Payment Type	Receipt	Reason
04/20/2020	\$1450	CHECK	W1020420F008	CIVIL COMPLAINT/PETITION/OTHER FIRST PAPER
03/04/2023	\$150	ELECTRONIC	B4923304J003	JURY FEES
08/18/2023	\$1435	ELECTRONIC	W6623818F005	CIVIL FIRST PAPER ANSWER/RESPONSE/PLEADING
08/21/2023	\$60	ELECTRONIC	B9523821M003	MOTION

## Proceedings

Date	#	Proceeding Text	Details
04/16/2020		DECLARATION (CERTIFICATE OF MERIT) OF ALEX E. CUNNY, ESQ. AS TO DEFENDANT DOE 1 (CONFIDENTIAL) FILED BY PLAINTIFF DOE, JOHN SF-1 , AN INDIVIDUAL	
04/16/2020		DECLARATION (CERTIFICATE OF MERIT) OF SYDELLE TABRIZY, M.A., M.F.T., FOR PLAINTIFF JOHN SF-1 DOE (CONFIDENTIAL) FILED BY PLAINTIFF DOE, JOHN SF-1 , AN INDIVIDUAL	



CGC-20-584162, JOHN SF-1 DOE VS. DOE 1, A CALIFORNIA CORPORATION SOLE ET AL

Date	#	Proceeding Text	Details
04/16/2020		NOTICE TO PLAINTIFF	
04/16/2020		PERSONAL INJURY/PROPERTY DAMAGE - NON-VEHICLE RELATED, COMPLAINT FILED BY PLAINTIFF DOE, JOHN SF-1 , AN INDIVIDUAL AS TO DEFENDANT DOE 1, A CALIFORNIA CORPORATION SOLE DOES 2-50, INCLUSIVE SUMMONS ISSUED, JUDICIAL COUNCIL CIVIL CASE COVER SHEET FILED CASE MANAGEMENT CONFERENCE SCHEDULED FOR SEP-16-2020 PROOF OF SERVICE DUE ON JUN-15-2020 CASE MANAGEMENT STATEMENT DUE ON AUG-24-2020 COMPLEX LITIGATION ASSIGNMENT REQUESTED BY FILING PARTIES; FEE INCLUDED IN FILING FEE	
05/15/2020		NOTICE OF SUBMISSION OF PETITION FOR COORDINATION (AND REQUEST FOR STAY OF PROCEEDINGS PRIOR TO DETERMINATION OF PETITION) (TRANSACTION ID # 65640433) FILED BY PLAINTIFF DOE, JOHN SF-1 , AN INDIVIDUAL	
06/30/2020		NOTICE OF ENTRY OF ORDER/NOTICE OF RULING FILED ASSIGNING COORDINATION MOTION JUDGE IN "NORTHERN CALIFORNIA CLERGY CASES" (TRANSACTION ID # 65736426) FILED BY PLAINTIFF DOE, JOHN SF-1 , AN INDIVIDUAL	
08/21/2020		CASE MANAGEMENT STATEMENT (TRANSACTION ID # 65869310) FILED BY PLAINTIFF DOE, JOHN SF-1 , AN INDIVIDUAL JURY DEMANDED, ESTIMATED TIME FOR TRIAL: 22.0 DAYS	
08/28/2020		CASE MANAGEMENT CONFERENCE OF SEP-16-2020 CONTINUED TO JAN-13-2021 AT 10:30 AM IN DEPARTMENT 610 FOR STATUS OF COORDINATION. NOTICE SENT BY COURT.	
11/10/2020		NOTICE OF ORDER OF CHAIR OF JUDICIAL COUNCIL OF CALIFORNIA ASSIGNING COORDINATION TRIAL JUDGE (TRANSACTION ID # 66098524) FILED BY PLAINTIFF DOE, JOHN SF-1 , AN INDIVIDUAL	
12/18/2020		CASE MANAGEMENT STATEMENT (TRANSACTION ID # 66197966) FILED BY PLAINTIFF DOE, JOHN SF-1 , AN INDIVIDUAL JURY DEMANDED, ESTIMATED TIME FOR TRIAL: 22.0 DAYS	
12/29/2020		CASE MANAGEMENT CONFERENCE OF JAN-13-2021 IS OFF CALENDAR. CASE COORDINATED WITH JCCP 5108. NOTICE SENT BY COURT.	

CGC-20-584162, JOHN SF-1 DOE VS. DOE 1, A CALIFORNIA CORPORATION SOLE ET AL

Date	#	Proceeding Text	Details
11/03/2021		SUMMONS ON COMPLAINT (TRANSACTION ID # 67067097), PROOF OF SERVICE ONLY, FILED BY PLAINTIFF DOE, JOHN SF-1 , AN INDIVIDUAL SERVED OCT-25-2021, SUBSTITUTE SERVICE ON NATURAL PERSON, MAILING DATE OCT-26-2021 AS TO DEFENDANT DOE 1, A CALIFORNIA CORPORATION SOLE	
01/14/2022		1ST AMENDED COMPLAINT / 1ST AMENDED NOTICE OF ADOPTION FORM AND 1ST AMENDED COMPLAINT **FILED IN ALAMEDA COUNTY IN JCCP 5108; ENTRY IS USED FOR INFORMATIONAL PURPOSES ONLY ** FILED BY PLAINTIFF DOE, JOHN SF-1 , AN INDIVIDUAL AS TO DEFENDANT DOE 1, A CALIFORNIA CORPORATION SOLE DOES 2-50, INCLUSIVE	
02/10/2023		JURY FEES (TRANSACTION ID # 210028462) DEPOSITED BY PLAINTIFF DOE, JOHN SF-1 , AN INDIVIDUAL	
07/20/2023		2ND AMENDED COMPLAINT / 2ND AMENDED NOTICE OF ADOPTION FORM AND 2ND AMENDED MASTER COMPLAINT **FILED IN ALAMEDA COUNTY IN JCCP 5108; ENTRY IS USED FOR INFORMATIONAL PURPOSES ONLY ** FILED BY PLAINTIFF DOE, JOHN SF-1 , AN INDIVIDUAL AS TO DEFENDANT DOE 1, A CALIFORNIA CORPORATION SOLE DOES 2-50, INCLUSIVE	
07/20/2023		NOTICE OF ORDER TRANSFERRING JOHN SF-1 V. RCASF, SAN FRANCISCO, CGC-20-584162, TO SAN FRANCISCO FOR TRIAL (TRANSACTION ID # 100206800) FILED BY PLAINTIFF DOE, JOHN SF-1 , AN INDIVIDUAL	
08/01/2023		ADDED TO CALENDAR FOR CASE MANAGEMENT CONFERENCE HEARING SET FOR SEP-20-2023 AT 10:30 AM IN DEPT 610	
08/01/2023		ORDER SETTING CASE MANAGEMENT CONFERENCE SENT BY COURT	
08/02/2023		ADDED TO CALENDAR FOR JURY TRIAL. (TRIAL DATE SET IN ALAMEDA PRIOR TO TRANSFER.) JURY TRIAL SET FOR AUG-23-2023 AT 09:30 AM IN DEPT 604	
08/02/2023		NOTICE OF ENTRY OF ORDER/NOTICE OF RULING FILED (TRANSACTION ID # 100208089) FILED BY PLAINTIFF DOE, JOHN SF-1 , AN INDIVIDUAL	
08/02/2023		SINGLE ASSIGNMENT TO VISITING JUDGE HAROLD E KAHN (RET. SAN	

CGC-20-584162, JOHN SF-1 DOE VS. DOE 1, A CALIFORNIA CORPORATION SOLE ET AL

Date	#	Proceeding Text	Details
		FRANCISCO) FOR ALL PURPOSES. CASE MANAGEMENT CONFERENCE SET FOR AUG-11-2023 AT 9:30 AM IN DEPT. 210. SEP-20-2023 CASE MANAGEMENT CONFERENCE IS OFF CALENDAR. NOTICE SENT BY COURT. (206)	
08/03/2023		NOTICE OF TIME AND PLACE OF TRIAL SENT BY COURT. (206)	
08/04/2023		170.6 PEREMPTORY CHALLENGE PENDING AS TO JUDGE HAROLD E. KAHN / PEREMPTORY CHALLENGE TO JUDICIAL OFFICER (C.C.P. 170.6) OF JUDGE HAROLD E. KAHN (TRANSACTION ID # 210043900) FILED BY PLAINTIFF DOE, JOHN SF-1 , AN INDIVIDUAL	
08/10/2023		ANSWER TO 2ND AMENDED COMPLAINT (ANSWER TO "SECOND AMENDED NOTICE OF ADOPTION FORM" AND "SECOND AMENDED MASTER COMPLAINT FOR DAMAGES") (TRANSACTION ID # 70611845) FILED BY DEFENDANT THE ROMAN CATHOLIC ARCHBISHOP OF SAN FRANCISCO A CORPORATION SOLE	
08/10/2023		CASE IS SINGLY RE-ASSIGNED FROM VISITING JUDGE HAROLD KAHN TO JUDGE GARRETT L. WONG FOR ALL PURPOSES AFTER PLAINTIFF'S CCP 170.6 PEREMPTORY CHALLENGE AS TO JUDGE KAHN. CASE MANAGEMENT CONFERENCE SET FOR AUG-11-2023 AT 9:30 AM IS MAINTAINED AND WILL BE HEARD IN DEPT. 504. TRIAL DATE ON 8/23/23 IS MAINTAINED. NOTICES SENT BY COURT. (206)	
08/10/2023		PROOF OF SERVICE (TRANSACTION ID # 70611845) FILED BY DEFENDANT THE ROMAN CATHOLIC ARCHBISHOP OF SAN FRANCISCO A CORPORATION SOLE	
08/11/2023		MINUTES FOR AUG-11-2023 9:30 AM	
08/14/2023		CASE MANAGEMENT CONFERENCE OF AUG-11-2023 IS OFF CALENDAR BY COURT. CONFERENCE HELD. MOTIONS IN LIMINE FILING SCHEDULE ESTABLISHED. JUDGE: GARRETT L. WONG, CLERK: K. SEPTIEN, REPORTER: KIMBERLY D'URSO CSR#11372-530.521.2948-DURSOREPORTING@GMAIL.COM, (504).	
08/14/2023		JURY TRIAL SET FOR AUG-23-2023 CONTINUED TO AUG-23-2023 AT 9:30 AM IN 604 TO BE HEARD BEFORE THE HON. GARRETT WONG PER REASSIGNMENT ON 8/10/23. (206)	

CGC-20-584162, JOHN SF-1 DOE VS. DOE 1, A CALIFORNIA CORPORATION SOLE ET AL

Date	#	Proceeding Text	Details
08/16/2023		DECLARATION OF STEVEN D. PENROD (TRANSACTION ID # 70653056) FILED BY DEFENDANT THE ROMAN CATHOLIC ARCHBISHOP OF SAN FRANCISCO A CORPORATION SOLE	
08/16/2023		DECLARATION OF ZACHARY SMITH IN OPPOSITION TO PLAINTIFFS JOINT MOTION TO CONSOLIDATE CASES FOR TRIAL (TRANSACTION ID # 70653056) FILED BY DEFENDANT THE ROMAN CATHOLIC ARCHBISHOP OF SAN FRANCISCO A CORPORATION SOLE	
08/16/2023		DECLARATION OF ZACHARY SMITH IN SUPPORT OF DEFENDANTS MOTION TO BIFURCATE TRIAL (TRANSACTION ID # 70653056) FILED BY DEFENDANT THE ROMAN CATHOLIC ARCHBISHOP OF SAN FRANCISCO A CORPORATION SOLE	
08/16/2023		MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF MOTION TO BIFURCATE TRIAL PURSUANT TO CIVIL CODE SECTION 3295 D (TRANSACTION ID # 70653056) FILED BY DEFENDANT THE ROMAN CATHOLIC ARCHBISHOP OF SAN FRANCISCO A CORPORATION SOLE	
08/16/2023		MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF OPPOSITION TO PLAINTIFFS JOINT MOTION TO CONSOLIDATE CASES FOR TRIAL (TRANSACTION ID # 70653056) FILED BY DEFENDANT THE ROMAN CATHOLIC ARCHBISHOP OF SAN FRANCISCO A CORPORATION SOLE	
08/16/2023		MOTION IN LIMINE NO. 1 TO PROHIBIT MENTION OF DEFENDANTS WEALTH OR PROFITS (TRANSACTION ID # 70653056) FILED BY DEFENDANT THE ROMAN CATHOLIC ARCHBISHOP OF SAN FRANCISCO A CORPORATION SOLE	
08/16/2023		NOTICE OF MOTION AND MOTION TO BIFURCATE TRIAL PURSUANT TO CIVIL CODE SECTION 3295 D (TRANSACTION ID # 70653056) FILED BY DEFENDANT THE ROMAN CATHOLIC ARCHBISHOP OF SAN FRANCISCO A CORPORATION SOLE HEARING SET FOR AUG-23-2023 AT 09:30 AM IN DEPT 504	
08/16/2023		PROOF OF SERVICE BY ELECTRONIC MAIL (TRANSACTION ID # 70653056) FILED BY DEFENDANT THE ROMAN CATHOLIC ARCHBISHOP OF SAN FRANCISCO A CORPORATION SOLE	
08/16/2023		PROOF OF SERVICE BY ELECTRONIC MAIL MEMORANDUM OF POINTS AND	

CGC-20-584162, JOHN SF-1 DOE VS. DOE 1, A CALIFORNIA CORPORATION SOLE ET AL

Date	#	Proceeding Text	Details
		AUTHORITIES IN SUPPORT OF OPPOSITION TO PLAINTIFF'S MOTION TO CONSOLIDATE CASE FOR TRIAL; DECLARATIONS IN SUPPORT OF OPPOSITION; REQUEST FOR JUDICIAL NOTICE (TRANSACTION ID # 70653065) FILED BY DEFENDANT THE ROMAN CATHOLIC ARCHBISHOP OF SAN FRANCISCO A CORPORATION SOLE	
08/16/2023		REQUEST FOR JUDICIAL NOTICE AND DECLARATION OF ZACHARY SMITH IN SUPPORT OF DEFENDANTS MOTION TO BIFURCATE TRIAL PURSUANT TO CIVIL CODE SECTION 3295 D (TRANSACTION ID # 70653056) FILED BY DEFENDANT THE ROMAN CATHOLIC ARCHBISHOP OF SAN FRANCISCO A CORPORATION SOLE	
08/16/2023		REQUEST FOR JUDICIAL NOTICE AND DECLARATION OF ZACHARY SMITH IN SUPPORT OF DEFENDANTS OPPOSITION TO PLAINTIFFS JOINT MOTION TO CONSOLIDATE CASES FOR TRIAL (TRANSACTION ID # 70653056) FILED BY DEFENDANT THE ROMAN CATHOLIC ARCHBISHOP OF SAN FRANCISCO A CORPORATION SOLE	
08/17/2023		DECLARATION OF ZACHARY SMITH IN SUPPORT OF DEFENDANTS MOTIONS IN LIMINE (TRANSACTION ID # 70665512) FILED BY DEFENDANT THE ROMAN CATHOLIC ARCHBISHOP OF SAN FRANCISCO A CORPORATION SOLE	
08/17/2023		DEFENDANTS MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF MOTION TO STRIKE IRRELEVANT AND IMPROPER MATTER FROM PLAINTIFFS PLEADING (C.C.P. 436) (TRANSACTION ID # 70665512) (TRANSACTION ID # 70665512) (TRANSACTION ID # 70665512) FILED BY DEFENDANT THE ROMAN CATHOLIC ARCHBISHOP OF SAN FRANCISCO A CORPORATION SOLE	
08/17/2023		JOINT MOTION IN LIMINE NO. 1 TO EXCLUDE EVIDENCE OF, REFERRAL TO, AND INSTRUCTIONS OR ARGUMENT OF ALLOCATION OF FAULT TO FR. PRITCHARD OR ANY OTHER PERSON OR ENTITY; DECLARATION OF ALEX E. CUNNY, ESQ. (TRANSACTION ID # 210045164) FILED BY PLAINTIFF DOE, JOHN SF-1 , AN INDIVIDUAL	
08/17/2023		JOINT MOTION IN LIMINE NO. 2 TO EXCLUDE EVIDENCE IN SUPPORT OF DEFENDANT ARCHBISHOP'S DENIAL OF NOTICE; DECLARATION OF ALEX E. CUNNY, ESQ. (TRANSACTION ID #	

CGC-20-584162, JOHN SF-1 DOE VS. DOE 1, A CALIFORNIA CORPORATION SOLE ET AL

Date	#	Proceeding Text	Details
		210045164) FILED BY PLAINTIFF DOE, JOHN SF-1 , AN INDIVIDUAL	
08/17/2023		JOINT MOTION IN LIMINE NO. 3 TO EXCLUDE EVIDENCE OF, REFERRAL TO, OR QUESTIONING ABOUT THE MOLESTATION OR ABUSE OF NON-PARTY FAMILY MEMBERS OF PLAINTIFF BY INDIVIDUALS OTHER THAN FR. PRITCHARD; DECLARATION OF ALEX E. CUNNY (TRANSACTION ID # 210045164) FILED BY PLAINTIFF DOE, JOHN SF-1 , AN INDIVIDUAL	
08/17/2023		MOTION IN LIMINE NO. 2: TO PROHIBIT MENTION OF OTHER CASES OR CLAIMS (TRANSACTION ID # 70665512) FILED BY DEFENDANT THE ROMAN CATHOLIC ARCHBISHOP OF SAN FRANCISCO A CORPORATION SOLE	
08/17/2023		MOTION IN LIMINE NO. 3: TO PROHIBIT EVIDENCE ARGUMENT AND OR MENTION OF PRITCHARD AS A PARTY TO THE ACTION (TRANSACTION ID # 70665512) FILED BY DEFENDANT THE ROMAN CATHOLIC ARCHBISHOP OF SAN FRANCISCO A CORPORATION SOLE	
08/17/2023		MOTION IN LIMINE NO. 4: TO PROHIBIT EVIDENCE ARGUMENT AND OR MENTION OF THE 2004 RECREATED LETTER (TRANSACTION ID # 70665512) FILED BY DEFENDANT THE ROMAN CATHOLIC ARCHBISHOP OF SAN FRANCISCO A CORPORATION SOLE	
08/17/2023		MOTION IN LIMINE NO. 5: TO PRECLUDE EXPERTS OPINIONS ON PLAINTIFFS LOST EARNINGS (TRANSACTION ID # 70665512) FILED BY DEFENDANT THE ROMAN CATHOLIC ARCHBISHOP OF SAN FRANCISCO A CORPORATION SOLE	
08/17/2023		NOTICE AND MOTION TO STRIKE IRRELEVANT AND IMPROPER MATTER FROM PLAINTIFFS PLEADING (C.C.P. 436) (TRANSACTION ID # 70665512) (TRANSACTION ID # 70665512) (TRANSACTION ID # 70665512) FILED BY DEFENDANT THE ROMAN CATHOLIC ARCHBISHOP OF SAN FRANCISCO A CORPORATION SOLE HEARING SET FOR AUG-23-2023 AT 09:30 AM IN DEPT 302	
08/17/2023		PROOF OF SERVICE FOR NOTICE AND MOTION TO STRIKE IRRELEVANT AND IMPROPER MATTER FROM PLAINTIFF'S PLEADING, ETC. (TRANSACTION ID # 70665512) FILED BY DEFENDANT THE ROMAN CATHOLIC ARCHBISHOP OF SAN FRANCISCO A CORPORATION SOLE	

CGC-20-584162, JOHN SF-1 DOE VS. DOE 1, A CALIFORNIA CORPORATION SOLE ET AL

Date	#	Proceeding Text	Details
08/17/2023		REQUEST FOR JUDICIAL NOTICE AND DECLARATION OF ZACHARY SMITH IN SUPPORT OF DEFENDANTS MOTIONS IN LIMINE (TRANSACTION ID # 70665512) FILED BY DEFENDANT THE ROMAN CATHOLIC ARCHBISHOP OF SAN FRANCISCO A CORPORATION SOLE	
08/17/2023		REQUEST FOR JUDICIAL NOTICE OF PLAINTIFF JOHN SF-1 DOE'S JOINT MOTION IN LIMINE NO. 2 TO EXCLUDE EVIDENCE IN SUPPORT OF DEFENDANT ARCHBISHOP'S DENIAL OF NOTICE (TRANSACTION ID # 210045164) FILED BY PLAINTIFF DOE, JOHN SF-1 , AN INDIVIDUAL	
08/21/2023		NOTICE OF STAY OF PROCEEDINGS REGARDING BANKRUPTCY (TRANSACTION ID # 100210026) FILED BY DEFENDANT THE ROMAN CATHOLIC ARCHBISHOP OF SAN FRANCISCO A CORPORATION SOLE	
08/21/2023		PROOF OF SERVICE OF NOTICE OF STAY OF PROCEEDINGS (TRANSACTION ID # 100210026) FILED BY DEFENDANT THE ROMAN CATHOLIC ARCHBISHOP OF SAN FRANCISCO A CORPORATION SOLE	
08/24/2023		LAW AND MOTION 302, DEFENDANT THE ROMAN CATHOLIC ARCHBISHOP OF SAN FRANCISCO'S MOTION TO STRIKE IRRELEVANT AND IMPROPER MATTER FROM PLAINTIFFS PLEADING (C.C.P. 436). OFF CALENDAR. MOTION NOT FILED AND SERVED IN COMPLIANCE WITH CCP 1005. JUDGE: RICHARD B. ULMER JR., CLERK: M. GOODMAN, NOT REPORTED. (302/RBU)	
08/24/2023		MINI MINUTES FOR AUG-23-2023 09:30 AM FOR DEPT 302	

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